

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEW JERSEY**

**ZEO HEALTH LTD., ET AL.,**  
*Plaintiff*

V.

**SUMMONS IN A CIVIL CASE**

**ZOI GLOBAL, LLC, ET AL.,**  
*Defendant*

**CASE NUMBER: 2:21-CV-11410-ES-MF**

TO: *(Name and address of Defendant):*

Lori R. Lee  
Chester Woods Professional Park  
385 State Route 24  
Suite 3H  
Chester, NJ 07930

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States Agency, or an office or employee of the United States described in Fed. R. civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Dariush Keyhani  
Keyhani LLC  
1050 30th Street NW  
Washington, DC 20007

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

s/ WILLIAM T. WALSH  
CLERK



ISSUED ON 2021-05-25 12:28:31, Clerk  
USDC NJD

<b>RETURN OF SERVICE</b>		
Service of the Summons and complaint was made by me(1)	DATE	
NAME OF SERVER ( <i>PRINT</i> )	TITLE	
<i>Check one box below to indicate appropriate method of service</i>		
<div style="margin-bottom: 10px;"><input type="checkbox"/> Served personally upon the defendant. Place where served: _____</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Name of person with whom the summons and complaint were left: _____</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Returned unexecuted: _____</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Other (specify) : _____</div>		
<b>STATEMENT OF SERVICE FEES</b>		
TRAVEL	SERVICES	TOTAL
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <div style="margin-top: 20px;"><div style="display: inline-block; width: 45%; vertical-align: top;">Executed on _____ Date</div><div style="display: inline-block; width: 55%; vertical-align: top; margin-left: 10px;">_____ <i>Signature of Server</i></div></div> <div style="margin-top: 10px; text-align: center;">_____ <i>Address of Server</i></div>		

**THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ZEO HEALTH LTD.,	§	
MICAH PORTNEY,	§	
TOUCHSTONE LIFE ESSENTIALS, INC.,	§	
and NORWOOD E. STONE,	§	Case No. 2:21-cv-11410
	§	
Plaintiffs,	§	JURY TRIAL DEMANDED
	§	
vs.	§	
	§	
ZOI GLOBAL, LLC,	§	
LORI R. LEE, DENISE STEPHENS,	§	
METRON NUTRACEUTICALS, LLC, and	§	
NIKOLAOS TSIRIKOS-KARAPANOS,	§	
	§	
Defendants.	§	

**AMENDED COMPLAINT**

Plaintiffs ZEO HEALTH LTD. (“Zeo Health”), MICAH PORTNEY (“Mr. Portney”), TOUCHSTONE LIFE ESSENTIALS, INC. (“Touchstone Essentials”), and NORWOOD E. STONE (“Mr. Stone”) (collectively, “Plaintiffs”) file this Amended Complaint against Defendants ZOI GLOBAL, LLC (“Zoi Global”), LORI R. LEE (“Ms. Lee”), DENISE STEPHENS (“Ms. Stephens”), METRON NUTRACEUTICALS, LLC (“Metron”), and NIKOLAOS TSIRIKOS-KARAPANOS (“Dr. Tsirikos-Karapanos”) (collectively, “Defendants”), and as claim for relief state as follows:

**NATURE OF THE ACTION**

1. This is an action for false and misleading advertising under the Lanham Act § 43(a) (15 U.S.C. § 1125(a)) and for defamation, product disparagement, and unfair competition in violation of New Jersey law.

### **PARTIES**

2. Plaintiff Zeo Health Ltd. is a New York corporation with an address of 100 Waxhaw Parkway #870, Waxhaw, North Carolina, 28173.

3. Plaintiff Micah Portney, the president and founder of Zeo Health, is a citizen of North Carolina.

4. Zeo Health is the original manufacturer of zeolite supplements in the United States. Zeo Health is a globally recognized brand and sells its zeolite products worldwide, including to retail chains, health practitioners, and online stores.

5. Plaintiff Touchstone Life Essentials, Inc. is a North Carolina company with an address of 101 Bronzewood Court, Cary, North Carolina, 27518.

6. Plaintiff Norwood E. (“Eddie”) Stone, the founder and CEO of Touchstone Essentials, is a citizen of North Carolina.

7. Touchstone Essentials is a global seller of nutritional supplements, including natural zeolite detox and whole food supplements and premium organic powders. One of its standout products is the Touchstone Essentials Pure Body Extra Strength (now known as “Pure Body Extra”) natural zeolite detoxifier. Touchstone Essentials is a competitor of Plaintiff Zeo Health and of Defendants.

8. On information and belief, Defendant Zoi Global, LLC is a New Mexico company with a principal place of business at 3900 Juan Tabo NE, Albuquerque, New Mexico, 87111. Zoi Global is a direct competitor of Zeo Health and Touchstone Essentials in the zeolite supplement market.

9. On information and belief, Defendant Lori R. Lee is an affiliate and advisor to Zoi Global and is a citizen of New Jersey.

10. On information and belief, Defendant Denise Stephens is a founder and CEO of Zoi Global and is a citizen of Texas.

11. On information and belief, Defendant Metron Nutraceuticals, LLC is an Ohio company with an address of 4600 Euclid Avenue #401, Cleveland, Ohio 44103. On information and belief, Metron's business involves the research, development, and manufacture of dietary supplements, including Zoi Global's ClearDrops, an oral zeolite supplement.

12. On information and belief, Defendant Dr. Nikolaos Tsirikos-Karapanos is the owner, founder, president, and managing member of Metron and the inventor of ClearDrops. On information and belief, Dr. Tsirikos-Karapanos is a citizen of Ohio.

13. On information and belief, Dr. Tsirikos-Karapanos and Metron are one and the same. Likewise, Dr. Tsirikos-Karapanos and Zoi Global are intertwined: Dr. Tsirikos-Karapanos is featured prominently on the Zoi Global website and social media, including as the inventor/formulator of its ClearDrops product, and as the featured spokesperson in numerous Zoi Global videos. Zoi Global also refers to Dr. Tsirikos-Karapanos as "Our Inventor" and to his three U.S. patents as "Our Patents."

14. On information and belief, Defendants develop, manufacture, sell, and advertise dietary supplements, including ClearDrops. Zoi Global sells and advertises its zeolite products, including ClearDrops, across the United States including within this district.

#### **JURISDICTION AND VENUE**

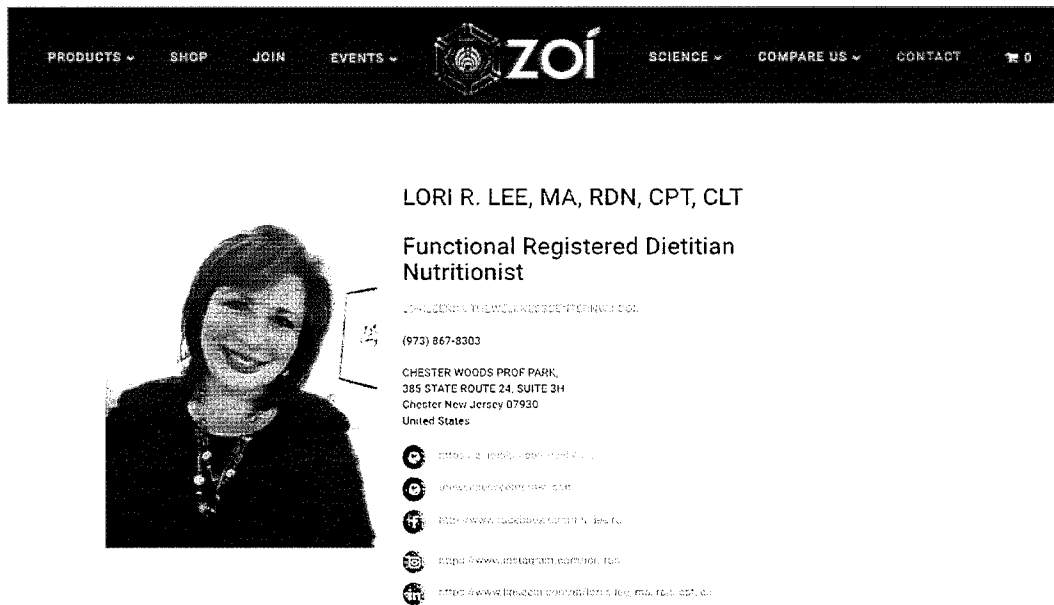
15. This Court has subject matter jurisdiction under 15 U.S.C. § 1121 and 28 U.S.C. § 1331, because this action arises under the Lanham Act.

16. This Court has supplemental jurisdiction over Plaintiffs' state law claims pursuant to 28 U.S.C. § 1367(a).

17. Venue in this judicial district is proper under Title 28, United States Code, §§ 1391 and 1400 because Defendants conduct business within this District. On information and belief, Defendants sell products in this District, including Metron-manufactured ClearDrops, via the Zoi Global website and through distributors. Defendants advertise their products in this District, e.g., through Zoi Global's website and social media, including in videos featuring Ms. Stephens, Dr. Tsirikos-Karapanos, and Metron. In addition, a substantial part of the events giving rise to Plaintiffs' claims occurred in this District. Defendants' false and misleading advertisements, Defendants' defamatory statements about Plaintiffs, and Defendants' disparagement of Plaintiffs' products were targeted to—and have been viewed by—customers and/or potential customers in this District, including by clients, potential clients, customers, and/or potential customers of Ms. Lee and the Wellness Center of Northwest Jersey.

18. Additionally, venue is proper because Defendant Ms. Lee resides and conducts business in this District. Ms. Lee is a health educator and affiliate and advisor to Zoi Global. She creates content for the Zoi Global website, zoiglobal.com, is prominently featured on the website, and creates and hosts webinars posted on the website. All of the website's pages, including the homepage, feature a link in the upper lefthand corner stating: "WELCOME FROM: LORI R. LEE, MA, RDN, CPT, CLT FUNCTIONAL REGISTERED DIETITIAN NUTRITIONIST."

19. The "CONTACT" tab on the Zoi Global website leads to a web page featuring a photograph of Ms. Lee, along with links to Ms. Lee's contact information in New Jersey. No contact information for any other individual or entity is given.



This “CONTACT” web page features Ms. Lee’s address at “CHESTER WOODS PROF PARK, 385 STATE ROUTE 24, SUITE 3H Chester New Jersey 07930” and her email address, [LORILEERD@THEWELLNESSCENTERNWJ.COM](mailto:LORILEERD@THEWELLNESSCENTERNWJ.COM). The web page links to The Wellness Center of Northwest Jersey, of which Ms. Lee is the “founder & executive director.” Likewise, the Wellness Center of Northwest Jersey’s website, [thewellnesscenternwj.com](http://thewellnesscenternwj.com), includes a link to the Zoi Global website, features pictures of Zoi Global’s products, and invites visitors of the site to help distribute/sell these products. The Wellness Center of Northwest Jersey’s homepage references Dr. Tsirikos-Karapanos and identifies him as: “Triple Board Certified as a Medical Doctor, Pharmacist, Cardiovascular Surgeon & Inventor of ZOI ClearDrops, ClearDetox Pro and ZOI ClearSleep.” Zoi Global refers to Dr. Tsirikos-Karapanos as “Our Inventor” and to his three U.S. patents as “Our Patents.” The Wellness Center of Northwest Jersey’s website directs customers and potential customers (including through hyperlinks) to the Zoi Global website.



20. This Court has personal jurisdiction over Defendants because of Defendants' continuous and systematic contacts and business activities within the state of New Jersey and within this District.

### **BACKGROUND**

#### **Plaintiffs Zeo Health and Micah Portney and Their Zeolite Pure Powder**

21. Zeo Health is the original manufacturer of zeolite supplements in the United States and has been in business for nearly twenty years. Zeolite is a natural volcanic mineral with a wide variety of uses and applications.

22. Zeo Health was founded in 1999 by Mr. Portney. Zeo Health was the first zeolite supplementation manufacturer in the United States. Mr. Portney has worked with world-renowned scientists and geologists to thoroughly understand the science behind zeolite and its uses for health and is one of the foremost experts of zeolite supplementation in the world.

23. Zeo Health is a globally recognized brand and sells its zeolite products worldwide, including to retail chains, health practitioners, and online stores. Its products include zeolite powder (including "Zeolite Pure"), zeolite capsules, and zeolite suspension. As the pioneer of zeolite supplements in this country, Zeo Health and Mr. Portney have devoted an extraordinary amount of time, research, and dedication into developing these products.

24. Studies by toxicologists have proven that Zeo Health's zeolite supplements are safe and effective. In the twenty years Zeo Health has been in business, there has been no pattern or history of negative health issues associated with the use of Zeo Health's products. Furthermore, a third-party 2015 study performed by scientists at the University of Missouri, experts in testing for heavy metals and bioavailability, determined that Zeo Health's zeolite does not leach lead (or arsenic) and, in fact, may detoxify it. Zeo Health states this information on its website and provides

links to the abstract of the University of Missouri study, along with other lab tests and toxicology reports establishing the safety of its products.

**Plaintiffs Touchstone Essentials and Eddie Stone and Their Pure Body Extra Strength Zeolite Detoxifier**

25. Touchstone Essentials, founded in 2012 by Mr. Stone, is a global seller of nutritional supplements, including natural zeolite detox and whole food supplements and premium organic powders. All of its products are lab-tested and backed by science, and all products are formulated and manufactured to stringent quality standards. Touchstone Essentials currently ships its products to over fifty-five different countries around the world. It is a competitor of Plaintiff Zeo Health and of Defendants.

26. Touchstone Essentials' growth has been driven largely by two standout products, one of which is the Pure Body Extra zeolite detoxifier. To create this product, Touchstone Essentials started with natural mineral zeolite—a scientifically proven detoxifier—and used a proprietary process that included a cleansing process for the natural zeolite (that was validated by independent lab testing) to make it a highly effective detox.

27. Touchstone Essentials thoroughly cleans the zeolite in its products and has invested in third-party independent testing of its zeolite products. The test results are available online for anyone to view. The zeolite, as an aluminosilicate, used by Touchstone Essentials has been granted Generally Recognized As Safe (GRAS) status by the Food and Drug Administration.

28. Touchstone Essentials' natural health supplements are backed by a body of scientific knowledge and are endorsed by top doctors, health educators, and experts. Some of the renowned contributors who appear on its health webinars and contribute to its blog include Dr. Alex Lee, board-certified in Internal Medicine and Gastroenterology; Dr. Stephen A. Aiello,

board-certified in Internal Medicine, Geriatrics, and Holistic & Integrative Medicine; and Lucinda Miller, one of the UK's leading naturopaths and a specialist in children's health.

**Defendants and Zoi ClearDrops Liquid Zeolite**

29. Defendants, who are direct competitors of Plaintiffs, develop, manufacture, and sell dietary supplements, including ClearDrops, an oral zeolite supplement.

30. Ms. Lee is also prominently featured on the Zoi Global website, zoiglobal.com. The website's homepage features a link stating: "WELCOME FROM: LORI R. LEE, MA, RDN, CPT, CLT FUNCTIONAL REGISTERED DIETITIAN NUTRITIONIST." The "CONTACT" tab on the Zoi Global website leads directly to a web page featuring Ms. Lee. The "CONTACT" web page on which Ms. Lee is featured directly links to The Wellness Center of Northwest Jersey, of which Ms. Lee is the "founder & executive director." Likewise, the Wellness Center of Northwest Jersey's website, thewellnesscenternwj.com, includes a link to the Zoi Global website. On information and belief, Ms. Lee is a health educator and affiliate and advisor to Zoi Global, and she creates content for the Zoi Global website and creates and hosts webinars posted on the website.

31. Ms. Stephens is a founder and CEO of Zoi Global and is featured prominently in numerous videos on Zoi Global's website and social media, including YouTube and Facebook. On information and belief, Ms. Stephens oversees, and is responsible for, the content of Zoi Global's website and social media accounts.

32. On information and belief, Metron's business involves the research, development, and manufacture of dietary supplements, including products containing zeolite clinoptilolite fragments. According to Zoi Global's website and social media, Metron is the exclusive formulator of Zoi ClearDrops.

33. On information and belief, Dr. Tsirikos-Karapanos is the president, owner, founder, and managing member of Metron, the formulator for Zoi Global, and the inventor of Zoi ClearDrops. He is featured prominently in Zoi Global's website and social media, including YouTube and Facebook. According to Zoi Global's website, Dr. Tsirikos-Karapanos is a board-certified pharmacist, medical doctor, and cardiovascular surgeon and "recipient of prestigious awards in thoracic and cardiovascular surgery."

34. On information and belief, Dr. Tsirikos-Karapanos, the owner, founder, president, and managing member of Metron, has both actual and apparent authority to act as an agent of Metron. Metron explicitly and/or implicitly gave Dr. Tsirikos-Karapanos the authority to engage in the conduct described herein, and Dr. Tsirikos-Karapanos reasonably believed, in accordance with Metron's manifestations, that he should so act. Metron is mentioned numerous times on Zoi Global's website and social media, including in its videos, and specifically in connection with Dr. Tsirikos-Karapanos. Dr. Tsirikos-Karapanos's "Inventor Bio" begins, "Dr. Nikolas Tsirikos, President Of Metron Nutraceuticals, Is The Inventor Of ClearDrops." In Defendants' videos, Dr. Tsirikos-Karapanos represents that he is appearing "from Metron," and both Dr. Tsirikos-Karapanos and Ms. Stephens repeatedly refer to Metron in Defendants' videos, including to the fact that Dr. Tsirikos-Karapanos is the president/a representative of the company. In Defendants' video titled "2021-05-25 – A TRUE AWAKENING – ZEO HEALTH ZEOLITE PURE," Dr. concludes, "from Metron Nutraceuticals in Cleveland, Ohio, thank you for your time." Metron is also mentioned on Ms. Lee's website. A Zoi Global video that was posted on Vimeo, titled "Zoi Global Reveal on Vimeo," states: "This video is the FIRST STEP of a lifetime partnership with Metron Nutraceuticals ...."

35. Additionally, the appearance of Dr. Tsirikos-Karapanos's authority to act as Metron's agent has been created by Metron in putting him forward as the face of the company and allowing him to represent the company in videos appearing on Defendants' websites and social media. Third parties consuming the false, misleading, and defamatory statements made by Dr. Tsirikos-Karapanos and Defendants have relied on Dr. Tsirikos-Karapanos's apparent authority to act for Metron, and this reliance has been reasonable under the circumstances.

36. Further, on information and belief, there is a unity of interest and ownership such that Metron and Dr. Tsirikos-Karapanos—Metron's owner, founder, president, and managing member—are one and the same. Metron is organized and operated as a mere instrumentality, or alter ego, of Dr. Tsirikos-Karapanos, Dr. Tsirikos-Karapanos uses the corporation to commit injustice and circumvent the law, and Dr. Tsirikos-Karapanos fails to maintain the corporate identity. The unity between Metron and Dr. Tsirikos-Karapanos is based on, but not limited to, Metron's failure to observe corporate formalities, the fact that Metron is merely a facade for the operations of Dr. Tsirikos-Karapanos, the non-functioning of other officers or directors of Metron, the absence of corporate records, and Metron's gross undercapitalization. Dr. Tsirikos-Karapanos, via the corporate form, has perpetrated, at least, an injustice.

**Defendants' False and Misleading Statements Regarding Zeo Health, Micah Portney, and Zeolite Pure Powder**

37. Defendants operate, appear in, and create content for their websites, Zoi Global (zoiglobal.com) and The Wellness Center of New Jersey (<http://www.thewellnesscenternwj.com>). Defendants also have social media accounts, including a ZOI Global channel on YouTube and a ZOI Global page on Facebook.

38. The Zoi Global website prominently features a “Compare Us” section, which compares Defendants’ products with those of various competitors. According to Defendants’ website, these comparison charts were prepared by Ms. Stephens.

39. One of Defendants’ comparison pages is titled “Zoi ClearDrops vs. Zeo Health Zeolite Pure,” available at <https://zoiglobal.com/compare-zeohealth-zeolitepure?u=well4life&r=C1167>. The webpage features an image of Zeolite Pure stamped with the word “PSEUDOSCIENCE.”



The Zoi Global website also features other images of Zeolite Pure stamped “PSEUDOSCIENCE” and “FAKE NEWS.”



The Zoi Global Facebook page, available at <https://www.facebook.com/zoiglobal2020/>, also compares Defendants' and Zeo Health's products. Zoi Global's Facebook page features a similar comparison image of Zeolite Pure stamped with the word "PSEUDOSCIENCE."



Defendants provide no support for their false claim that Zeo Health's products—which, like Defendants' products, are zeolite supplements—are “pseudoscience” or “fake news.”

40. The “Compare Us” section of the Zoi Global website features a twenty-nine-minute video in which Dr. Tsirikos-Karapanos makes various false, misleading, and disparaging



statements comparing Defendants' Zoi ClearDrops to Zeo Health's Zeolite Pure supplements. Dr. Tsirikos-Karapanos first details his credentials as a pharmacist, medical doctor, and cardiovascular surgeon, among others. He then goes on to make various false, misleading, and/or defamatory statements. He states, for example:

- “[I]t’s very clear that the quality of the formulator is a key factor regarding the quality of the final formulation, the final product .... I’m very cautious when I see dietary supplements that have a no-name individual as a formulator. It is not the case with Zeo Health Zeolite Pure. Mr. Micah Portney is the formulator of this product. And Mr. Micah Portney has a very well-known past in the market, and he’s also very well known to regulatory agencies like the Food and Drug Administration .... In September 2004 ... the FDA sent him a warning letter regarding his formulations. And later, in 2015/2016, his name is mentioned at the Biennial Report of the Attorney General of California .... So, this is a significant component of the background and history of Mr. Micah Portney. I can tell [you] that personally, I wouldn’t trust to take even a glass of water from Mr. Portney.”
- “It is mandatory for dietary supplements in the United States ... to be fully and adequately preserved .... [W]e don’t see in any preservative listed at the Zeo Health Zeolite Pure, and for this reason, we believe that the product is unpreserved. Now, let me tell you that, in simple words, it is illegal for a dietary supplement to be nonpreserved in the United States .... So, I’m just wondering how this product is still in the market, being nonpreserved. That’s a question mark there, and that’s a huge red flag.”
- “If you have dietary supplements formulation, you must test it for four elements, according to the United States Pharmacopeia .... These four elements are arsenic, cadmium, mercury,



and lead .... There's nothing to compare regarding Zeo Health relevant testing. All this information is unknown. We don't know how this product is made."

- "For the final product regarding the Zeo Health Zeolite Pure powder, we don't have any information, including elemental impurities. We don't know if Zeo Health Zeolite Pure is ever tested for elemental impurities, and if yes, for what elements at what concentration, etc. But at this point, let me tell you that this is very valid huge red flag, given the past of Mr. Micah Portney .... I really don't understand why Mr. Portney don't provide any information regarding elemental impurities in this formulation he makes, the Zeo Health Zeolite Pure. Based on his past, I think we are very entitled to feel that there is a huge question mark and a huge red flag regarding, first of all, the safe[ty] of this zeolite powder."

41. At the end of the video, Ms. Stephens, founder and CEO of Zeo Health, states: "Dr. Nikolaos, **you've laid the facts out on the table**. If the consumer is looking for the benefits of zeolite, the gold standard is at Zoi Global. Once the research is done, the answers are presented." (emphasis added).

42. Also on the Zoi Global website at <https://zoiglobal.com/compare-zeohealth-zeolitepure?u=well4life&r=C1167> are links to "DEPT OF HEALTH & HUMAN SERVICES," "CALIFORNIA DEPARTMENT OF JUSTICE," and "2020.04 – FDA LETTER TO BARRY COHEN" and a table purporting to compare Defendants' products with Zeo Health's. With respect to the products' "regulatory/litigation history," Defendants claim that they have an "excellent reputation," while Zeo Health has received "FDA warning letters":

DEFENDANT'S STATEMENT OF ISSUES		DEFENDANT'S STATEMENT OF ISSUES		DEFENDANT'S STATEMENT OF ISSUES	
		ZEO GLOBAL	ZEO HEALTH		
		ClearDrops®	Zeolite Pure		
SUPPLIER INFORMATION					
Name		Mutini Nutraceuticals, LLC Cleveland, OH	Unknown		
FDA Inspected		YES	Unknown		
FDA Registered		YES	Unknown		
FORMULATOR INFORMATION					
Name		Dr. Nikolaos Tsimkos-Karamanos	Micah Portney		
Regulatory/Litigation History		Excellent Reputation	Poor Reputation LITIGATION		

Defendants further claim that their products have no regulatory issues, while Zeo Health's have "multiple":

REGULATORY			
Issue(s)		NONE	Multiple

43. These statements are false and misleading. For example, none of the linked documents, or any other evidence provided by Defendants, are actually FDA warning letters. Nor do the documents state that Zeo Health's zeolite products—the subject of Defendants' comparison—have any regulatory or safety issues. Further, none of the linked documents supports that Zeo Health's competing zeolite supplements have been found to be unsafe, ineffective, or have received any complaints from customers. Additionally, Defendants' assertion that "it is illegal" and "a huge red flag" for Zeo Health's products to be nonpreserved is false and misleading: Zeolite Pure, which is a powder (and is heat-treated), does not require a preservative. Defendants' statements regarding the United States Pharmacopeia and testing of elements are similarly misleading, as that organization has no relationship to dietary supplements or their regulation.

44. As a result of Defendants' false and misleading statements, Zeo Health and Mr. Portney have suffered reputational harm and loss of business.

**Defendants' False and Misleading Statements Regarding Touchstone Essentials, Eddie Stone, and Pure Body Extra Strength**

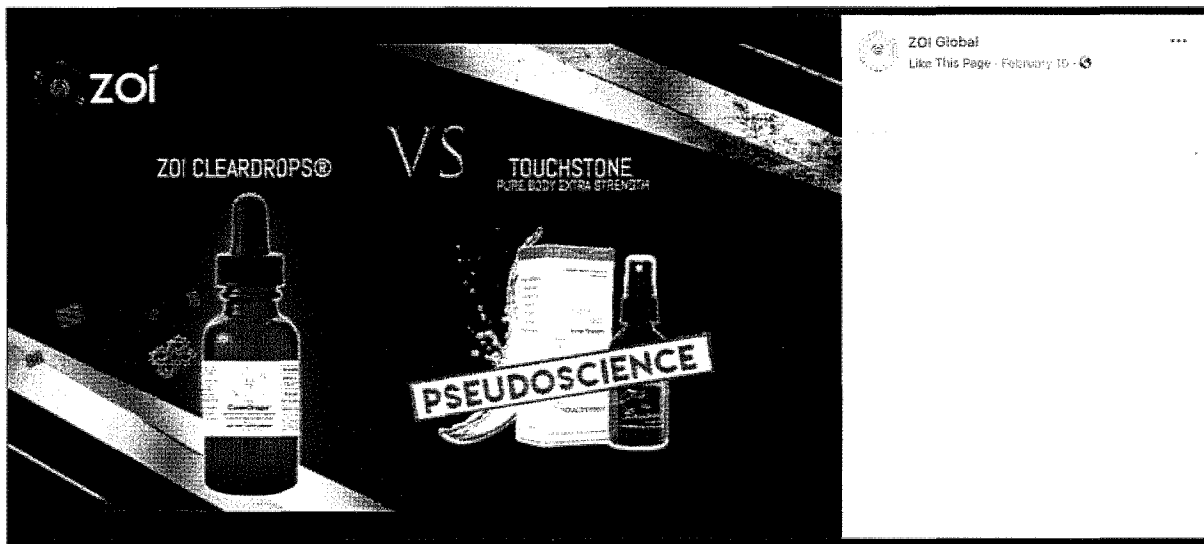
45. Another of Defendants' comparison webpages is titled "Zoi ClearDrops vs. Touchstone Pure Body Extra Strength," available at <https://zoiglobal.com/compare-touchstone?u=well4life&r=C1167>. The webpage features an image of Touchstone Pure Body Extra Strength stamped with the word "PSEUDOSCIENCE."



The Zoi Global website also features an image of Touchstone Pure Body Extra Strength stamped "PSEUDOSCIENCE" and "FAKE NEWS."



The Zoi Global Facebook page also compares Defendants' and Touchstone Essentials' products, available at <https://www.facebook.com/zoiglobal2020/>. Zoi Global's Facebook page features a similar comparison image of Touchstone Pure Body Extra Strength stamped with the word "PSEUDOSCIENCE."



Defendants provide no support for their claim that Plaintiffs' products—which, like Defendants' products, are zeolite supplements—are "pseudoscience" or "fake news."

46. The “Compare Us” section of the Zoi Global website features two videos in which Dr. Tsirikos-Karapanos compares Defendants’ product to Touchstone Essentials’ and makes various false, misleading, and disparaging statements about Touchstone Essentials, Mr. Stone, and Pure Body Extra Strength. The first video is twenty-nine minutes long, and the second video is one hour and sixteen minutes long. The second video is also available for view on Zoi Global’s YouTube channel under the title “ZOI Global Response To ZOI ClearDrops vs. Touchstone PBX Comparison.”

47. In the twenty-nine minute video, Ms. Stephens introduces Dr. Tsirikos-Karapanos as a triple-board certified PharmD, MD, and PhD, and “extremely qualified to speak to all of the scientific elements during this comparison.” Dr. Tsirikos-Karapanos then goes on to make various false, misleading statements, and/or defamatory statements, for example:

- “We have, as of today, zero information regarding the supplier [for Touchstone Essentials Pure Body Extra Strength] .... We don’t know if this supplier is an FDA registered or inspected company.”
- “[I]t is mandatory for all dietary supplements circulating in the United States, and in many other territories all over the world, to be preserved. Or, let me put it in lay language, in simpler language, it is illegal to have in the United States the product that is not preserved .... Unfortunately, I see that the Touchstone Essentials has no preservative within it .... We see a big red flag here with Touchstone Essentials Pure Body Extra Strength as nonpreserved. If this is true, and the Touchstone Essentials Pure Body Extra Strength is not preserved, that’s sad, and to my understanding this is a red flag, this is a non-FDA compliant feature.”

- “Interestingly, for the Touchstone Essentials, we don’t know the actual number of elements tested, but more importantly, ... we have seen from the information presented by Touchstone Essentials, that the test that they conduct ... the alarming component here is the method of analysis or the standard. These metals are tested according to the EPA standards. EPA is the Environmental Protection Agency in the United States, and has no jurisdiction over dietary supplements. To me, that’s is a very big question mark that this brings .... There is absolutely no regulatory issue regarding the Zoi Global ClearDrops .... Unfortunately, we see several red flags with the Touchstone Essentials Pure Body Extra Strength product. First, it seems, according to the information provided by Touchstone, that it is unpreserved, and that’s a bigtime problem. Also, this is outside of the FDA required standards for preservation. It seems also that elemental impurities have not been tested according to the FDA standards or requirements but according to the requirements of the ... EPA, which has no jurisdiction over dietary supplements.”

48. At the end of the video, Ms. Stephens, founder and CEO of Zeo Health, states: “Thank you so much, Dr. Nikolaos .... Like you said, we can hoodwink some people some of the time, but not all of the people all of the time. And at the end of the day, we put our science where our mouth is, we make it readily available, we don’t use any trickery words, and that is with great pride that Zoi Global can hang their hat, as Zoi Global is the zeolite gold standard.”

49. These statements are false and misleading. For example, there are no guidelines stating that Pure Body Extra must have an added preservative, and Plaintiffs use pasteurization and employ a variety of quality control measures to ensure that their products are safe. Additionally, Defendants misrepresent and omit information from the lab results they cite. And it is false and misleading for Defendants to state that, simply because the lab uses the common EPA

standards, Plaintiffs' products do not meet FDA standards, have "regulatory issues," and are "alarming."

50. In the second video, which is also posted on Defendants' YouTube channel, Ms. Stephens appears alongside Dr. Tsirikos-Karapanos. Dr. Tsirikos-Karapanos directs the entire video at Touchstone Essentials, and Mr. Stone specifically, whom he repeatedly addresses by name. The video contains various false, misleading, and/or defamatory statements, including:

- Repeated false and denigrating references to a company, Waiora Global, that Mr. Stone last worked for ten years ago as a minority partner, and a lawsuit against Waiora that did not involve any acts by Mr. Stone and from which he was dismissed with prejudice (and was not a party to the final settlement). Dr. Tsirikos-Karapanos states, for example:

1) "[A]ccording to your LinkedIn page, you were with Waiora from April 2004 until June 2011, and on February 2012, you started Touchstone Essentials. Class action against your company, Waiora, was filed on January 25, 2012. Five days later, on February 2012, you started Touchstone. I've heard by many, and I don't know and I make no determination because I don't have knowledge, that Waiora was the root of all evil in the zeolite space. Because of crazy claims of treating cancers, treating autism, treating other diseases. Again, I don't have knowledge about this, but that's what I've heard. Also, I've heard that Touchstone is your successful effort to rebrand your previous business, Waiora."

2) "[O]ne of your people in Waiora ... became member and partner of Metron Nutraceuticals. Well, after he stole products from Metron Nutraceuticals and relabeled them in his effort to sell them as his own products .... there was litigation about this

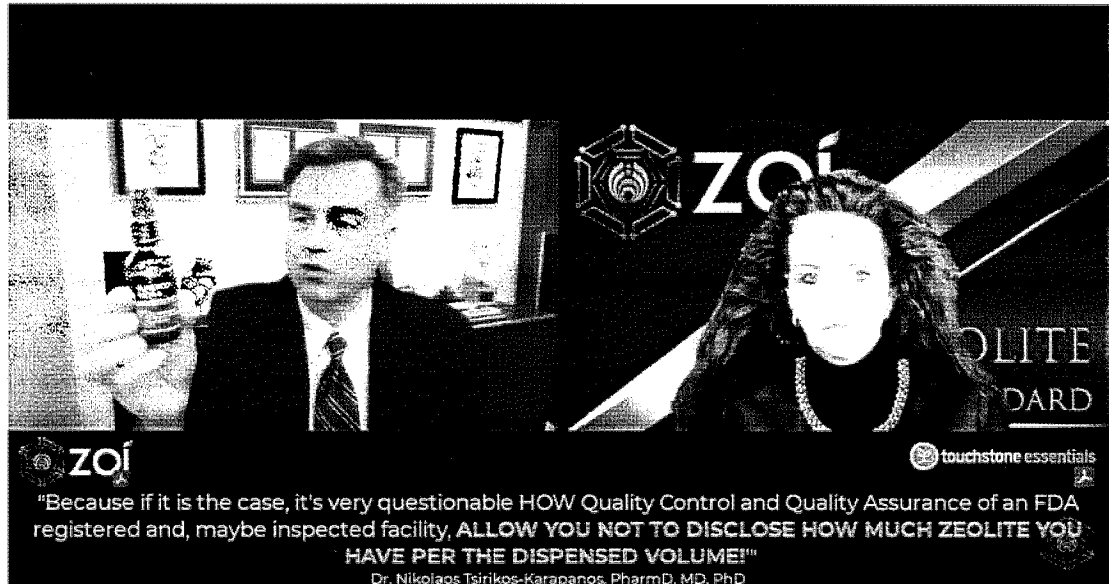


matter, and ... the court put [him] in Cuyahoga County jail for three days for civil and criminal contempt to the court.”

- 3) “Mr. Stone ... you don’t disclose, your company’s not disclosing, any amount of zeolite, but instead you disclose only what is the dispensed volume if someone pushes this button .... As a businessman involved in class action, alleging that your previous company, Waiora, was not putting in the bottle the amount of zeolite that was claimed in the label, do you realize that not having the amount of zeolite in your label smells a little Waiora? Has the flavor of Waiora? .... But Mr. Stone, let me tell you, not having the amount of zeolite in your bottle, it’s a huge red flag.”
- Multiple false and misleading statements that Plaintiffs’ products are not FDA compliant, including:
  - 1) “Is Pure Body Extra Strength manufactured at an FDA-registered facility? I’m saying this, because I don’t see it in the label, and I know firsthand as president of Metron Nutraceuticals, inspected by the FDA with a stellar outcome, and I know it as a pharmacist—board-certified pharmacist and medical doctor—that FDA-registered facilities would not risk to operate outside of the CGMP requirements as set by the FDA. So, I see that you don’t disclose the amount of zeolite in your label. So I’m wondering, is this made at an FDA-registered and maybe inspected facility? Who made this product? Who agreed that this product will not disclose the amount of the zeolite on the label?”
  - 2) “Is the manufacturing of Pure Body Extra Strength done according to the FDA CGMP requirements as monitored by quality control and quality insurance? Because if it is the case, it’s very questionable how the quality control and quality assurance of an



FDA-registered and maybe inspected facility allow you to not to disclose how much zeolite you have per the dispensed volume.”



- Repeated false and misleading statements that Plaintiffs’ products are mislabeled, unnatural, and unsafe including:
  - 1) “We want to know how much exactly zeolite you have in this bottle. But Mr. Stone, let me tell you, not having the amount of zeolite in your bottle, it’s a huge red flag.”
  - 2) “Unfortunately, you’ve provide[d] some false information about the zeolite within Pure Body Extra Strength. You claim that the zeolite inside the Pure Body Extra Strength is natural zeolite .... The Zeolite inside Pure Body Extra Strength is a manufactured zeolite .... You have a manufactured zeolite, not a zeolite ‘as is’ .... There is a problem that you declare it as natural, it is not.”
  - 3) “[T]he free aluminum in your formulation is ... around ten times more than what it is permitted.”
- Repeated statements suggesting that Mr. Stone lacks knowledge and scientific understanding of the products-at-issue, for example: “Well, Mr. Norwood Eddie Stone,

you can read about the science behind ClearDrops if you spend the time to read our three patents. And if you don't understand the patents, and that I can understand, you can hire a real scientist to read our patents and explain it to you."

- Defendants also incorrectly state: "Mr. Norwood Eddie Stone, you do not have a proprietary, company-owned process."

51. Also on the Zoi Global website at <https://zoiglobal.com/compare-touchstone?u=well4life&r=C1167> is a table purporting to compare Defendants' products with Touchstone Essentials'. With respect to whether the products are "Adequately Preserved," Defendants claim that "YES," their products are preserved, while Touchstone Essentials' products are "Unpreserved" and "Non-FDA Compliant":

	ZOI GLOBAL	TOUCHSTONE ESSENTIALS
Other Ingredients	Vitamin C Certified Non-GMO Certified Gluten-Free	Pure Water
Preservative	Potassium sorbate	None
Adequately Preserved	YES	Unpreserved; Non-FDA Compliant
Starting Zeolite	Micronized Zeolite	Unknown

With respect to the products' "Elemental Impurities Testing Standards," Defendants claim that Touchstone Essentials' standards are "Non-FDA Compliant Test (Tested to EPA Standards)":

	ZOI GLOBAL	
Particle-Size Distribution (PSD)	90% [0.1 - 1.0] microns	30 - 50 nanometers
3rd Party Verification Particle-Size Distribution (PSD)	YES	NONE
Number of Elemental Impurities Tested	<u>29</u>	Unknown
Elemental Impurities Testing Standards	USP <232>, <233> ClearDrops is a dietary supplement tested to pharmaceutical liquid formulation standards.	Non-FDA Compliant Test Tested to EPA Standards

The hyperlink provided by Defendants links to a third-party laboratory analysis for Touchstone Essentials' zeolite product Pure Body—not for Touchstone Essentials' zeolite product Pure Body Extra Strength—thus, the incorrect link is provided and the lab results are misrepresented. Additionally, Defendants' second video falsely represents that Touchstone Essentials' zeolite product, Pure Body Extra, has detectable free aluminum that represents a danger to consumers: “[T]he free aluminum in your formulation is ... around ten times more than what it is permitted.” In fact, zeolites by their nature are aluminosilicates, which means that their molecular structure is aluminum and silicon; there is no free aluminum in zeolite as the aluminum is inherent in its structure. The lab analysis reference is not for Pure Body Extra, and is misrepresented as having free aluminum when in fact the lab analysis was an acid digest of the zeolite, to test each element, thereby showing its molecular contents.

Additionally, in the section of the table titled “Regulatory Issues,” Defendants state that their products have no issues while Touchstone Essentials' products are “Unpreserved; Non-FDA Compliant Elemental Impurities Testing Standards”:

REGULATORY ISSUES		
Issue(s)	NONE	Unpreserved, Non-FDA Compliant, Elemental Impurities Testing Standards

52. These statements are false and misleading. Defendants provide no support for their assertion that Touchstone Essentials' products are "unpreserved." Neither the linked laboratory analysis, nor any other evidence provided by Defendants, demonstrates that Touchstone Essentials' products are "non-FDA compliant" or that Touchstone Essentials' zeolite supplements have been found to be unsafe or ineffective in any way.

53. As a result of Defendants' false and misleading statements, Touchstone Essentials and Eddie Stone have suffered, and will imminently suffer, reputational harm and loss of business.

**Defendants' Additional False and Misleading Statements Plaintiffs As Retaliation for Filing This Lawsuit**

54. After Plaintiffs filed this lawsuit on May 18, 2021 (and emailed Ms. Lee a copy of the complaint on May 20, 2021), Defendants escalated their false and misleading attacks against Plaintiffs Zeo Health, Mr. Portney, Touchstone Essentials, and Mr. Stone.

55. On May 24, 2021, four days after Ms. Lee received notice of the lawsuit, Defendants Metron and Dr. Tsirikos-Karapanos wrote a retaliatory letter to the FDA regarding Zeo Health and Mr. Stone (**Ex. A**). The letter falsely stated Metron and Dr. Tsirikos-Karapanos "recently became aware of" Zeo Health's Zeolite Pure product. Metron and Dr. Tsirikos-Karapanos cite several of the same issues and documents from the Zoi Global website and videos to disparage and defame Zeo Health and Mr. Portney and to mislead customers as to the safety of their products. For example, Metron and Dr. Tsirikos-Karapanos repeat the false and/or misleading claims that Zeo Health's products contain excessively high amounts of lead and arsenic, that there was a determination of wrongdoing by the California Attorney General, and that

“Zeo Health and Mr. Portney are known to [the FDA’s] Office” based on past misconduct. Metron and Dr. Tsirikos-Karapanos submitted this letter despite the admonition on the FDA’s Safety Reporting Portal that, “Under 18 U.S.C. 1001, anyone who makes a materially false, fictitious, or fraudulent statement to the U.S. Government is subject to criminal penalties.” *See* Safety Reporting Portal, <https://www.safetyreporting.hhs.gov/SRP2/en/Home.aspx?sid=1461b42a-6e07-4fed-a6d8-a1aaf28f132f>.

56. Additionally, on May 27, 2021, Defendants posted a video titled “2021-05-25 – A TRUE AWAKENING – ZEO HEALTH ZEOLITE PURE” to the Zoi Global YouTube channel and website. The video, which features Ms. Stephens and Dr. Tsirikos-Karapanos, is directed at Plaintiffs Zeo Health and Micah Portney. In the video, Defendants make further false and misleading statements, including that Zeo Health’s Zeolite Pure product contains unsafe levels of arsenic, lead, and mercury.

Table - 2					
ZEO HEALTH ZEOLITE PURE - Dietary Supplement Standards - 5 g/day					
#	Element		Regulatory Standard		Dose: 5 g/day
			USP <2232> Limit		Result (ppm)
1	As	Arsenic	≤ 15	µg/day	30
2	Cd	Cadmium	≤ 5	µg/day	3.15
3	Pb	Lead	≤ 10	µg/day	85
4	Hg	Mercury	≤ 15	µg/day	19

- **Arsenic** exceeds the maximum permitted limit by: 100%
- **Lead** exceeds the maximum permitted limit by: 750%
- **Mercury** exceeds the maximum permitted limit by: 27%



2021-05-25 – A TRUE AWAKENING - ZEO HEALTH ZEOLITE PURE

33 views • May 27, 2021

LIKE DISLIKE SHARE SAVE ...

Dr. Tsirikos-Karapanos states that because of these safety issues, he reported Zeolite Pure to the FDA. He concludes his presentation by stating: “As a board-certified pharmacist and medical doctor, I sent my report to the FDA regarding Pure yesterday .... As [a] triple board-certified

pharmacist, medical doctor, and cardiovascular surgeon, I firmly believe that good quality dietary supplements, if used appropriately, can contribute to our wellness. For the last seven years, as president of Metron Nutraceuticals, I became aware of the changes needed in the dietary supplement industry in general. Hopefully my presentation today will contribute and help in making the zeolite space and marketplace, and in general, the dietary supplements domain, a better and safer place.”

57. Defendants also took retaliatory action against Touchstone Essentials and Mr. Stone. On May 27, 2021, May 27, 2021, Defendants posted a video titled “2021-05-25 – A TRUE AWAKENING – TOUCHSTONE PURE BODY EXTRA (PBX) STRENGTH” to the Zoi Global YouTube channel and website. The video, which features Ms. Stephens and Dr. Tsirikos-Karapanos, is directed at Plaintiffs Touchstone Essentials and Mr. Stone. In the video, Defendants make false and misleading statements, including that Pure Body Extra does not contain zeolite, is not manufactured at an FDA-registered facility, and is not manufactured under quality control or quality assurance.



1. Why don't you disclose the amount of zeolite in PBX?
2. Do you have any zeolite in PBX?
3. Is PBX manufactured at an FDA registered facility?
4. Is PBX manufacturing done under QC/QA?



2021-05-25 – A TRUE AWAKENING – TOUCHSTONE PURE BODY EXTRA (PBX) STRENGTH

At the end of the video, Dr. Tsirikos-Karapanos repeats the statement made in the Zeo Health video: “As [a] triple board-certified pharmacist, medical doctor, and cardiovascular surgeon, I firmly believe that good quality dietary supplements, if used appropriately, can contribute to our wellness. For the last seven years, as president of Metron Nutraceuticals, I became aware of the changes needed in the dietary supplement industry in general. Hopefully my presentation today will contribute and help in making the zeolite space and marketplace, and in general, the dietary supplements domain, a better and safer place.”

**COUNT ONE**  
**FALSE ADVERTISING UNDER THE LANHAM ACT**

58. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs 1-57 herein.

59. Defendants’ statements, including that Plaintiffs Zeo Health and Mr. Portney and their zeolite products are unsafe, have “huge red flags,” have been the subject of FDA warning letters, have been the subject of “multiple” regulatory issues, and are “pseudoscience” and “fake news,” are false and misleading. Defendants’ statements that Mr. Portney is untrustworthy, is “very well known to regulatory agencies like the Food and Drug Administration,” and has a disreputable past, are also false.

60. These statements are presented as fact by Defendants. At the end of the Zeo Health comparison video, Ms. Stephens states: “Dr. Nikolaos, you’ve laid the facts out on the table. If the consumer is looking for the benefits of zeolite, the gold standard is at Zoi Global. Once the research is done, the answers are presented.” Defendants use Dr. Tsirikos-Karapanos’s and Metron’s purported knowledge and expertise to provide credibility. Defendants further claim to support their statements with documents linked via hyperlinks. Defendants’ statements are demonstrably untrue and can be independently verified as such. For example, the three documents



linked by Defendants do not support their claims, and empirical verification establishes that Zeo Health's products have not been the subject of FDA warning letters, have not been the subject of "multiple" regulatory issues or been found to have any safety issues, and have not been found to be "pseudoscience" or "fake news."

61. Additionally, Defendants' statements, including that Plaintiffs Touchstone Essentials and Mr. Stone's zeolite products are non-FDA compliant, unsafe, mislabeled, do not contain zeolite, have "red flags," and are "pseudoscience" and "fake news," are false and misleading. Defendants' statements that Touchstone Essentials is the "rebrand" of an allegedly dishonest (or worse) company that was the "root of all evil in the zeolite space," that there was a judgment against Mr. Stone/that Mr. Stone was found to have any liability in the Waiora litigation, and that Mr. Stone lacks knowledge and scientific understanding about the products-at-issue are also false.

62. These statements are also presented as fact by Defendants. At the end of the first Touchstone Essentials video, Ms. Stephens states: "And at the end of the day, we put our science where our mouth is, we make it readily available, we don't use any trickery words, and that is with great pride that Zoi Global can hang their hat." Defendants also use Dr. Tsirikos-Karapanos's and Metron's purported knowledge and expertise to provide credibility. Defendants further claim to support their statements with linked documents, and document and video excerpts included in the videos. Defendants' statements are demonstrably untrue and can be independently verified as such. For example, empirical verification establishes that Plaintiffs' products have never been found to be non-FDA compliant, unsafe, unnatural, "pseudoscience," or "fake news." Further, empirical verification establishes that Defendants' characterization of the Waiora litigation and Mr. Stone's involvement in the lawsuit is false.



63. Defendants' statements about Plaintiffs, which are held out as fact and purport to be supported by documents and public records and which are presented by a doctor in the website and social media videos, create an actual deception or at least a tendency to deceive a substantial portion of the intended audience, customers in the supplement market.

64. Defendants' deception is material in that it is likely to influence purchasing decisions, as safety and efficacy drive the purchasing decisions of customers in the supplement market.

65. On information and belief, Defendants' advertised goods, which are directed to customers all over the country and can be viewed internationally via Defendants' website and social media, traveled in interstate commerce.

66. Defendants' false advertising created a likelihood of injury and actual injury to Plaintiffs in terms of declining sales, loss of good will, and reputation.

**COUNT TWO**  
**DEFAMATION OF ZEO HEALTH LTD. UNDER NEW JERSEY LAW**

67. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs 1-66 herein.

68. Defendants' statements, including that Zeo Health and its zeolite products have "huge red flags," are unsafe and not FDA compliant, have been the subject of FDA warning letters, have been the subject of "multiple" regulatory issues, and are "pseudoscience" and "fake news," are false and injurious to Zeo Health's reputation and subject Zeo Health to a loss of good will and confidence in which they are held by customers, prospective customers, and others. Defendants' statements that Zeo Health's president and founder Mr. Portney is untrustworthy, is "very well known to regulatory agencies like the Food and Drug Administration," and has a disreputable past, also have this effect.

69. Defendants' statements, which are held out as fact and purport to be supported by documents and public records and the opinions of a multi-credentialed doctor and president of Metron Nutraceuticals are demonstrably untrue and can be independently verified as such.

70. Defendants' statements, which cite Zeo Health, Mr. Portney, and their products by name, are statements concerning Plaintiffs.

71. Defendants' statements, which are publicly posted on the Zoi Global website and social media, were, and continue to be, communicated to customers and potential customers throughout the world.

72. Defendants' statements were not only negligent but were made with reckless disregard of whether they were false and with knowledge that they were false. The documents provided by Defendants in the links on their website do not support Defendants' claims, and empirical verification establishes that Plaintiffs' products do not have "huge red flags," are FDA compliant, have not been the subject of FDA warning letters, have not been the subject of "multiple" regulatory issues or been found to have any safety issues, and have not been found to be "pseudoscience" or "fake news." Further, according to Defendants' website, Dr. Tsirikos-Karapanos is the president of Metron (a developer and manufacturer of dietary supplements), as well as a board-certified pharmacist, medical doctor, and cardiovascular surgeon and "recipient of prestigious awards in thoracic and cardiovascular surgery" and, as such, was aware and should have been aware of the falsity of his statements.

73. Defendants' statements affected Zeo Health in its business, trade, and profession.

74. Defendants' defamatory statements caused damage to Zeo Health in terms of loss of sales, good will, and reputation.

**COUNT THREE**  
**DEFAMATION OF MICAH PORTNEY UNDER NEW JERSEY LAW**

75. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs 1-74 herein.

76. Defendants' statements, including that Mr. Portney is untrustworthy, is "very well known to regulatory agencies like the Food and Drug Administration," and has a disreputable past, that his company Zeo Health's products are unsafe, are not FDA compliant, have "huge red flags," have been the subject of FDA warning letters, have been the subject of "multiple" regulatory issues, and are "pseudoscience" and "fake news," are false and injurious to Mr. Portney's reputation and subject him to a loss of good will and confidence in which he is held by customers, prospective customers, and others.

77. Defendants' statements, which are held out as fact and purport to be supported by documents and public records and the opinions of a multi-credentialed doctor and president of Metron are demonstrably untrue and can be independently verified as such.

78. Defendants' statements, which cite Mr. Portney, Zeo Health, and their products by name, are statements concerning Plaintiffs.

79. Defendants' statements, which are publicly posted on the Zoi Global website and social media, were, and continue to be, communicated to customers and potential customers throughout the world.

80. Defendants' statements were not only negligent but were made with reckless disregard of whether they were false and with knowledge that they were false. The documents provided by Defendants in the links on the Zoi Global website do not support Defendants' claims, and empirical verification establishes that Mr. Portney is not "well known" by regulatory agencies, and his products do not have "huge red flags," have not been the subject of FDA warning letters, have not been the subject of "multiple" regulatory issues or been found to have any safety issues,

and have not been found to be “pseudoscience” or “fake news.” Further, according to the Zoi Global website, Dr. Tsirikos-Karapanos is the president of Metron (a developer and manufacturer of dietary supplements), as well as a board-certified pharmacist, medical doctor, and cardiovascular surgeon and “recipient of prestigious awards in thoracic and cardiovascular surgery” and, as such, was aware and should have been aware of the falsity of his statements.

81. Defendants’ statements affected Mr. Portney in his business, trade, and profession.

82. Defendants’ defamatory statements caused damage to Mr. Portney in terms of loss of sales, good will, and reputation.

**COUNT FOUR**  
**DEFAMATION OF TOUCHSTONE ESSENTIALS UNDER NEW JERSEY LAW**

83. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs 1-82 herein.

84. Defendants’ statements, including that Plaintiffs Touchstone Essentials and its zeolite products are non-FDA compliant, unsafe, mislabeled, do not contain zeolite, have “red flags,” and are “pseudoscience” and “fake news,” are false and injurious to Touchstone Essentials’ reputation and subject Touchstone Essentials to a loss of good will and confidence in which it is held by customers, prospective customers, and others. Defendants’ statements that Touchstone Essentials is the “rebrand” of an allegedly dishonest (or worse) company that was the “root of all evil in the zeolite space,” that there was a judgment against Mr. Stone/that Mr. Stone was found to have any liability in the Waiora litigation, and that Touchstone Essentials’ founder and CEO Mr. Stone lacks knowledge and scientific understanding about the products-at-issue also have this effect.

85. Defendants' statements, which are held out as fact and purport to be supported by documents and public records and the opinions of a multi-credentialed doctor and president of Metron are demonstrably untrue and can be independently verified as such.

86. Defendants' statements, which cite Touchstone Essentials, Mr. Stone, and their products by name, are statements concerning Plaintiffs.

87. Defendants' statements, which are publicly posted on the Zoi Global website and social media, were, and continue to be, communicated to customers and potential customers throughout the world.

88. Defendants' statements were not only negligent but were made with reckless disregard of whether they were false and with knowledge that they were false. The documents provided by Defendants in the links on the Zoi Global website and referenced in their videos do not support Defendants' claims, and empirical verification establishes that Touchstone Essentials' products are not non-FDA compliant, are not unsafe, are not mislabeled, contain zeolite, do not have "red flags," and are not "pseudoscience" or "fake news." Further, empirical verification establishes that Defendants' characterization of the Waiora litigation and Mr. Stone's involvement in the lawsuit is false, as are their statements that Touchstone Essentials is a "rebrand" of Waiora and the "root of all evil in the zeolite space," and that Mr. Stone lacks knowledge and scientific understanding about the products-at-issue are also false. Further, according to the Zoi Global website, Dr. Tsirikos-Karapanos is the president of Metron (a developer and manufacturer of dietary supplements), a board-certified pharmacist, medical doctor, and cardiovascular surgeon and "recipient of prestigious awards in thoracic and cardiovascular surgery" and, as such, was aware and should have been aware of the falsity of his statements.

89. Defendants' statements affected, and will imminently affect, Touchstone Essentials in its business, trade, and profession.

90. Defendants' defamatory statements caused, and will imminently cause, damage to Touchstone Essentials in terms of loss of sales, good will, and reputation.

**COUNT FIVE**  
**DEFAMATION OF EDDIE STONE UNDER NEW JERSEY LAW**

91. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs 1-90 herein.

92. Defendants' statements, including that Touchstone Essentials' zeolite products are non-FDA compliant, unsafe, mislabeled, do not contain zeolite, have "red flags," and are "pseudoscience" and "fake news," are false and injurious to Mr. Stone's reputation, as the founder and CEO of Touchstone Essentials, and subject him to a loss of good will and confidence in which he is held by customers, prospective customers, and others. Defendants' statements that Touchstone Essentials is the "rebrand" of an allegedly dishonest (or worse) company that was the "root of all evil in the zeolite space," that there was a judgment against Mr. Stone/that Mr. Stone was found to have any liability in the Waiora litigation, and that Touchstone Essentials' founder and CEO Mr. Stone lacks knowledge and scientific understanding about the products-at-issue also have this effect.

93. Defendants' statements, which are held out as fact and purport to be supported by documents and public records and the opinions of a multi-credentialed doctor and president of Metron are demonstrably untrue and can be independently verified as such.

94. Defendants' statements, which cite Mr. Stone, Touchstone Essentials, and their products by name, are statements concerning Plaintiffs.

95. Defendants' statements, which are publicly posted on the Zoi Global website and social media, were, and continue to be, communicated to customers and potential customers throughout the world.

96. Defendants' statements were not only negligent but were made with reckless disregard of whether they were false and with knowledge that they were false. The documents provided by Defendants in the links on the Zoi Global website and referenced in their videos do not support Defendants' claims, and empirical verification establishes that Touchstone Essentials' products are not non-FDA compliant, are not unsafe, are not mislabeled, contain zeolite, do not have "red flags," and are not "pseudoscience" or "fake news." Further, empirical verification establishes that Defendants' characterization of the Waiora litigation and Mr. Stone's involvement in the lawsuit is false, as are their statements that Touchstone Essentials is a "rebrand" of Waiora and the "root of all evil in the zeolite space," and that Mr. Stone lacks knowledge and scientific understanding about the products-at-issue are also false. Further, according to the Zoi Global website, Dr. Tsirikos-Karapanos is the president of Metron (a developer and manufacturer of dietary supplements), as well as a board-certified pharmacist, medical doctor, and cardiovascular surgeon and "recipient of prestigious awards in thoracic and cardiovascular surgery" and, as such, was aware and should have been aware of the falsity of his statements.

97. Defendants' statements affected, and will imminently affect, Mr. Stone in his business, trade, and profession.

98. Defendants' defamatory statements caused, and will imminently cause, damage to Mr. Stone in terms of loss of sales, good will, and reputation.

**COUNT SIX**  
**PRODUCT DISPARAGEMENT UNDER NEW JERSEY LAW**



99. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs 1-98 herein.

100. Defendants' statements regarding Zeo Health and Mr. Portney, which are publicly posted on the Zoi Global website, were, and continue to be, communicated to customers and potential customers throughout the world. These statements, which include claims that Plaintiffs' products have been found to have safety issues, are unsafe, are not FDA compliant, and are "pseudoscience" and "fake news," relate to Plaintiffs' business and products.

101. Defendants' statements were made with reckless disregard of whether they were false and/or with knowledge that they were false. The documents provided by Defendants in the links on their website do not support Defendants' claims, and empirical verification establishes that Plaintiffs' products do not have "huge red flags," have not been the subject of FDA warning letters, are not unsafe, have not been the subject of "multiple" regulatory issues or been found to have any safety issues, and have not been found to be "pseudoscience" or "fake news." Further, according to Defendants' website, Dr. Tsirikos-Karapanos is the president of Metron (a developer and manufacturer of dietary supplements), as well as a board-certified pharmacist, medical doctor, and cardiovascular surgeon and "recipient of prestigious awards in thoracic and cardiovascular surgery" and, as such, was aware and should have been aware of the falsity of his statements.

102. Defendants' statements are presented as fact by Defendants. For example, at the end of the Zeo Health comparison video, Ms. Stephens states: "Dr. Nikolaos, you've laid the facts out on the table. If the consumer is looking for the benefits of zeolite, the gold standard is at Zoi Global. Once the research is done, the answers are presented." Defendants use Dr. Tsirikos-Karapanos's and Metron's purported knowledge and expertise to provide credibility. Defendants further claim to support their statements with documents linked via hyperlinks. Defendants'



statements are demonstrably untrue and can be independently verified as such. For example, the three documents linked by Defendants do not support their claims, and empirical verification establishes that Plaintiffs' products have not been the subject of FDA warning letters, have not been the subject of "multiple" regulatory issues or been found to have any safety issues, and have not been found to be "pseudoscience" or "fake news."

103. Similarly, Defendants' statements regarding Touchstone Essentials and Mr. Stone, which are publicly posted on the Zoi Global website and social media, were, and continue to be, communicated to customers and potential customers throughout the world. These statements, which include claims that Plaintiffs' products are non-FDA compliant, unsafe, mislabeled, do not contain zeolite, have "red flags," and are "pseudoscience" and "fake news," relate to Plaintiffs' business and products.

104. Defendants' statements were made with reckless disregard of whether they were false and/or with knowledge that they were false. The documents provided by Defendants in the links on their website and referenced in their videos do not support Defendants' claims, and empirical verification establishes that Touchstone Essentials' products are not non-FDA compliant, are not unsafe, are not mislabeled, contain zeolite, do not have "red flags," and are not "pseudoscience" or "fake news." Additionally, empirical verification establishes that Defendants' characterization of the Waiora litigation and Mr. Stone's involvement in the lawsuit is false, as are their statements that Touchstone Essentials is a "rebrand" of Waiora and the "root of all evil in the zeolite space," and that Mr. Stone lacks knowledge and scientific understanding about the products-at-issue are also false. Further, according to Defendants' website, Dr. Tsirikos-Karapanos is the president of Metron (a developer and manufacturer of dietary supplements), as well as a board-certified pharmacist, medical doctor, and cardiovascular surgeon and "recipient of

prestigious awards in thoracic and cardiovascular surgery” and, as such, was aware and should have been aware of the falsity of his statements.

105. Defendants’ statements are presented as fact. For example, at the end of the Zeo Health comparison video, Ms. Stephens states: “Dr. Nikolaos, you’ve laid the facts out on the table. If the consumer is looking for the benefits of zeolite, the gold standard is at Zoi Global. Once the research is done, the answers are presented.” At the end of one of the Touchstone Essentials comparison videos, Ms. Stephens states: “Thank you so much, Dr. Nikolaos .... Like you said, we can hoodwink some people some of the time, but not all of the people all of the time. And at the end of the day, we put our science where our mouth is, we make it readily available, we don’t use any trickery words, and that is with great pride that Zoi Global can hang their hat ....” Defendants use Dr. Tsirikos-Karapanos’s and Metron’s purported knowledge and expertise to provide credibility. Defendants further claim to support their statements with documents presented in the videos and linked via hyperlinks.

106. Defendants’ statements are demonstrably untrue and can be independently verified as such. For example, the documents cited and linked by Defendants do not support their claims. Empirical verification establishes that Zeo Health’s and Mr. Portney’s products do not have “huge red flags,” have not been the subject of FDA warning letters, have not been the subject of “multiple” regulatory issues or been found to have any safety issues, are FDA compliant, have not been found to be “pseudoscience” or “fake news,” and that Mr. Portney is not “well known” by regulatory agencies. Additionally, empirical verification establishes that Touchstone Essentials’ products are not non-FDA compliant, are not unsafe, are not mislabeled, contain zeolite, do not have “red flags,” and are not “pseudoscience” or “fake news,” and that Defendants’ characterization of the Waiora litigation and Mr. Stone’s involvement in the lawsuit is false, as are

their statements that Touchstone Essentials is a “rebrand” of Waiora and the “root of all evil in the zeolite space.”

107. Defendants’ disparaging statements played a material and substantial part in leading others not to deal with Plaintiffs and caused damage to Plaintiffs in terms of loss of sales, good will, and reputation.

**COUNT SEVEN**  
**UNFAIR COMPETITION UNDER NEW JERSEY LAW**

108. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs 1-107 herein.

109. Defendants’ statements regarding Zeo Health and Mr. Portney and their products were made in bad faith and with reckless disregard of whether they were false and/or with knowledge that they were false. The documents provided by Defendants in the links on their website do not support Defendants’ claims, and empirical verification establishes that Zeo Health’s products do not have “huge red flags,” have not been the subject of FDA warning letters, are safe and FDA compliant, have not been the subject of “multiple” regulatory issues or been found to have any safety issues, and have not been found to be “pseudoscience” or “fake news.” Further, according to Defendants’ website, Dr. Tsirikos-Karapanos is the president of Metron (a developer and manufacturer of dietary supplements), as well as a board-certified pharmacist, medical doctor, and cardiovascular surgeon and “recipient of prestigious awards in thoracic and cardiovascular surgery” and, as such, was aware and should have been aware of the falsity of his statements.

110. Likewise, Defendants’ statements regarding Touchstone Essentials and Mr. Stone and their products were made in bad faith and with reckless disregard of whether they were false and/or with knowledge that they were false. The documents provided by Defendants in the links on their website and referenced in their videos do not support Defendants’ claims, and empirical

verification establishes that Touchstone Essentials' products are not non-FDA compliant, are not unsafe, are not mislabeled, contain zeolite, do not have "red flags," and are not "pseudoscience" or "fake news." Additionally, empirical verification establishes that Defendants' characterization of the Waiora litigation and Mr. Stone's involvement in the lawsuit is false, as are their statements that Touchstone Essentials is a "rebrand" of Waiora and the "root of all evil in the zeolite space," and that Mr. Stone lacks knowledge and scientific understanding about the products-at-issue are also false. Further, according to Defendants' website, Dr. Tsirikos-Karapanos is the president of Metron (a developer and manufacturer of dietary supplements), as well as a board-certified pharmacist, medical doctor, and cardiovascular surgeon and "recipient of prestigious awards in thoracic and cardiovascular surgery" and, as such, was aware and should have been aware of the falsity of his statements.

111. These statements regarding Plaintiffs are presented as fact by Defendants. For example, at the end of the Zeo Health comparison video, Ms. Stephens states: "Dr. Nikolaos, you've laid the facts out on the table. If the consumer is looking for the benefits of zeolite, the gold standard is at Zoi Global. Once the research is done, the answers are presented." At the end of one of the Touchstone Essentials comparison videos, Ms. Stephens states: "Thank you so much, Dr. Nikolaos .... Like you said, we can hoodwink some people some of the time, but not all of the people all of the time. And at the end of the day, we put our science where our mouth is, we make it readily available, we don't use any trickery words, and that is with great pride that Zoi Global can hang their hat ...." Defendants use Dr. Tsirikos-Karapanos's and Metron's purported knowledge and expertise to provide credibility. Defendants further claim to support their statements with documents presented in the videos and linked via hyperlinks.

112. Defendants' statements were intended to mislead the public and, by directly comparing Plaintiffs' products to Defendants' products throughout their website and social media, were intended to induce the public to purchase Defendants' products in place of Plaintiffs'.

113. Defendants' false and misleading statements caused damage to Plaintiffs in terms of economic loss, loss of sales, good will, and reputation.

**PRAYER FOR RELIEF**

Wherefore, Plaintiffs Zeo Health Ltd., Micah Portney, Touchstone Essentials, and Eddie Stone pray for relief as follows:

- A. Preliminarily and permanently enjoin Defendants from publishing further false, misleading, defamatory, and disparaging statements about Plaintiffs and their products;
- B. Enter judgment against Defendants on all counts of the Complaint;
- C. Award Plaintiffs damages in an amount to be determined at trial;
- D. Award Plaintiffs enhanced damages as permitted by law, plus its reasonable attorneys' fees and the costs of this action; and
- E. Grant such other relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

In accordance with Fed. R. Civ. P. 38(b), Plaintiffs hereby demand a trial by jury for all issues triable by jury.

Dated: June 18, 2021

Respectfully submitted,

s/ Dariush Keyhani  
Dariush Keyhani  
Keyhani LLC  
1050 30th Street NW  
Washington, DC 20007  
Telephone: (202) 748-8950

Fax: (202) 318-8958

[dkeyhani@keyhanillc.com](mailto:dkeyhani@keyhanillc.com)

*Attorneys for Plaintiff*

# EXHIBIT A



Metron Nutraceuticals, LLC  
4600 Euclid Avenue  
Suite 401  
Cleveland, OH 44103, USA  
Tel: (216) 302-2832



Monday, May 24, 2021

VIA FedEx Courier

**Susan T. Mayne, PhD**  
**Director – Center For Food Safety And Applied Nutrition**  
**U.S. Food and Drug Administration**

U.S. Food and Drug Administration  
10903 New Hampshire Ave  
Silver Spring, MD 20993-0002  
USA

**RE: Zeolite PURE, ZEO Health, LTD., [zeohealth.com](http://zeohealth.com), Micah Portney, [zeolite.com](http://zeolite.com), Barry Cohen**

Dear Dr. Mayne,

I am Dr. Nikolaos Tsirikos-Karapanos, PharmD, MD, PhD, and President of Metron Nutraceuticals, LLC. Metron Nutraceuticals is FDA Registered (U.S. FDA Registration No.: 11613430980) and inspected by the FDA (Attachment – 1).

We recently became aware of a zeolite dietary supplement with the commercial name **Zeolite PURE** ("PURE") (Attachment – 2) manufactured by **ZEO Health, Ltd.**, ("ZEO Health") (Attachment – 3). **Mr. Micah Portney** ("Mr. Portney") is the owner of ZEO Health, Ltd. PURE is available through various distributors, including **Mr. Barry Cohen** ("Mr. Cohen") via his site [zeolite.com](http://zeolite.com) (Attachment – 4).

ZEO Health and Mr. Portney are known to your Office (Attachments – 5 and 6) and to the California Department of Justice, Office of the Attorney General (Attachment – 7), for having made health claims for their dietary supplements



including claims of “**Cancer Prevention and Treatment**”, and “**Cure Cancer and Autism.**”

In its **2015-2016 Biennial Report**, the California Attorney General specifically referred to the ***People v. Zeo Health, Ltd.*** case and stated that “*This case was filed against Zeo Health, Ltd., its affiliate Regal Supplements LLC, and owner, Micah Portney, for unfair business practices and false advertising, based on the sale of products intended for consumption that are adulterated with excessively high amounts of lead and arsenic and false claims that the products are safe and cure diseases including cancer and autism*” (Attachment – 7, page 54).

Mr. Cohen is known to the Federal Trade Commission (“FTC”) for making *Coronavirus treatment or prevention claims* for another ZEO Health manufactured zeolite dietary supplement on Facebook and on his website [zeolite.com](http://zeolite.com) (Attachment – 8).

PURE was recently purchased from [zeolite.com](http://zeolite.com) (Lot # 2010254 and Exp. Date 10/2025) and underwent Elemental Impurities analysis at SGS Chemical Solutions Laboratories, Inc. on April 2021. The relevant Analytical Report issued on April 30, 2021 is attached as Attachment – 9.

**The Analytical Report for Elemental Impurities of PURE presents serious concerns about the safety of PURE and that it may be harmful to the consumer.**

In the following the **Table – 1**, the Elemental Impurities results for PURE are presented based on the **USP <2232>** standards and limits for dietary supplements for **daily dose of 1 (one) g.**

Table - 1					
ZEO HEALTH ZEOLITE PURE - Dietary Supplement Standards - 1 g/day					
#	Element		Regulatory Standard		Dose: 1 g/day
			USP <2232> Limit		Result (ppm)
1	As	Arsenic	≤ 15	µg/day	6
2	Cd	Cadmium	≤ 5	µg/day	< 0.63
3	Pb	Lead	≤ 10	µg/day	17
4	Hg	Mercury	≤ 15	µg/day	< 3.8

Based on the Elemental Impurities results for PURE presented in the **Table – 1** above, the concentration of **Lead** exceeds the maximum permitted limit by **70%**.

PURE daily dose is advertised as **5 (five) g** (Attachments – 10 and 11).

In the following **Table – 2** the Elemental Impurities results for PURE are presented based on the **USP <2232>** standards and limits for dietary supplements for a **daily dose of 5 (five) g**.

Table - 2					
ZEO HEALTH ZEOLITE PURE - Dietary Supplement Standards - 5 g/day					
#	Element		Regulatory Standard		Dose: 5 g/day
			USP <2232> Limit		Result (ppm)
1	As	Arsenic	≤ 15	µg/day	30
2	Cd	Cadmium	≤ 5	µg/day	3.15
3	Pb	Lead	≤ 10	µg/day	85
4	Hg	Mercury	≤ 15	µg/day	19

Based on the Elemental Impurities results for PURE presented in the **Table – 2** above, the concentrations of three heavy metals exceed the maximum permitted limit as follows:

- **Arsenic** exceeds the maximum permitted limit by: **100%**
- **Lead** exceeds the maximum permitted limit by: **750%**
- **Mercury** exceeds the maximum permitted limit by: **27%**

At zeolite.com, PURE is advertised (Attachments – 10, 11 and 12) as:

- *“boosting the immune system”*
- *“balancing the pH of the body”*
- *“fighting certain types of health issues”*
- *“The Best After Chemotherapy Detox That Also Strengthens The Immune System”*

At the manufacturer site [zeohealth.com](http://zeohealth.com), PURE is advertised by providing user reviews (Attachment – 13) as:

- HPV thought by doctors to have turned to cancer disappearing after taking PURE
- “Treating an Autoimmune disease in the pancreas”

The **daily “Detox Dosage”** for PURE is advertised (Attachments – 10 and 11) as:

*“Take one scoop of Zeolite Pure mixed in water or juice three times a day for 90 days (scoop included).”*

One scoop of PURE is 5 (five) g (Attachments – 10 and 11), thus three scoops is **15 (fifteen) g**.

PURE is advertised by its manufacturer (ZEO Health) and its distributor as having pharmaceutical properties and PURE’s **daily “Detox Dosage”** is recommended as 15 (fifteen) g/day (Attachments – 10 and 11).

When factoring in the recommended **daily “Detox Dosage”** in **Table – 3** below, the Elemental Impurities results for PURE are presented based on the **USP <232>**, **<233>** standards and limits for pharmaceutical products and for a **daily “Detox Dosage” of 15 (fifteen) g**.

Table - 3					
ZEO HEALTH ZEOLITE PURE - Pharmaceutical Standards - 15 g/day					
#	Element		Regulatory Standard		<i>Detox Dosage 15 g/d</i>
			USP <232>, <233> Limit		Result (ppm)
1	Sb	Antimony	≤ 1,200	µg/day	2,250
2	As	Arsenic	≤ 15	µg/day	90
3	Ba	Barium	≤ 1,400	µg/day	5,850
4	Cd	Cadmium	≤ 5	µg/day	9.45
5	Cr	Chromium	≤ 11,000	µg/day	21,000
6	Co	Cobalt	≤ 50	µg/day	94.5
7	Cu	Copper	≤ 3,000	µg/day	5,700
8	Au	Gold	≤ 100	µg/day	375
9	Ir	Iridium	≤ 100	µg/day	195
10	Pb	Lead	≤ 5	µg/day	255
11	Li	Lithium	≤ 550	µg/day	1,035
12	Hg	Mercury	≤ 30	µg/day	57
13	Mo	Molybdenum	≤ 3,000	µg/day	5,700
14	Ni	Nickel	≤ 200	µg/day	375
15	Os	Osmium	≤ 100	µg/day	195
16	Pd	Palladium	≤ 100	µg/day	195
17	Pt	Platinum	≤ 100	µg/day	195
18	Rh	Rhodium	≤ 100	µg/day	195
19	Ru	Ruthenium	≤ 100	µg/day	195
20	Se	Selenium	≤ 150	µg/day	285
21	Ag	Silver	≤ 150	µg/day	285
22	Tl	Thallium	≤ 8	µg/day	15
23	Sn	Tin	≤ 6,000	µg/day	11,250
24	V	Vanadium	≤ 100	µg/day	195

Based on the Elemental Impurities results for PURE presented in the **Table – 3** above, **the concentrations of all 24 (twenty-four) heavy metals exceed significantly the maximum permitted limits.**

Additionally, PURE was tested for the Elemental Impurities for 5 (five) metals that are not regulated: Aluminium, Calcium, Magnesium, Potassium and Titanium.

In **Table – 4** below, Additional Elemental Impurities results for PURE are presented for a **daily “Detox Dosage” of 15 (fifteen) g.**

Table - 4					
ZEO HEALTH ZEOLITE PURE - Additional Testing - 15 g/day					
#	Element		Regulatory Standard		Dose: 15 g/day
			N/A		Result (ppm)
1	Al	Aluminium	N/A	µg/day	393,000
2	Ca	Calcium	N/A	µg/day	117,000
3	Mg	Magnesium	N/A	µg/day	31,500
4	K	Potassium	N/A	µg/day	390,000
5	Ti	Titanium	N/A	µg/day	6,900

Based on the Elemental Impurities results for PURE presented in **Table – 4** above, the concentration of Aluminium in the recommended by the distributor **daily “Detox Dosage” is 393,000 ppm.** Note that the PURE distributor recommends intake of 15 (fifteen) g of PURE **daily for 90 (ninety) days.**

Based on the Elemental Impurities results, the recommended **daily “Detox Dosage”** for PURE and the recommended intake for 90 (ninety) days, PURE can potentially be a harmful for the user as at its **daily “Detox Dosage”** contains **393,000 ppm** of Aluminium.

FDA has set a limit for Aluminium for bottled water of **0.2 mg/L (or 0.2 ppm)** (Attachment – 15, page 8).

ZEO Health claims that its products **“are specifically formulated using the highest quality zeolite, in order to deliver the most effective health**

**benefits.”** (Attachment – 14). Despite its assurance to consumers that ZEO Health ***“make(s) the strongest effort to produce the purest, highest quality products, in which you [the consumer] can have confidence”***, the aforementioned Elemental Impurities Analytical Report for PURE unfortunately speaks loudly to the opposite.

Thank you for your review of this matter and protections you provide in investigating products that may potentially be harmful to the public.

Best Regards,  
Dr. Nikolaos Tsirikos-Karapanos

**Nikolaos Tsirikos-Karapanos**  
**PharmD, MD, PhD, FETCS**  
**President**  
**Metron Nutraceuticals**

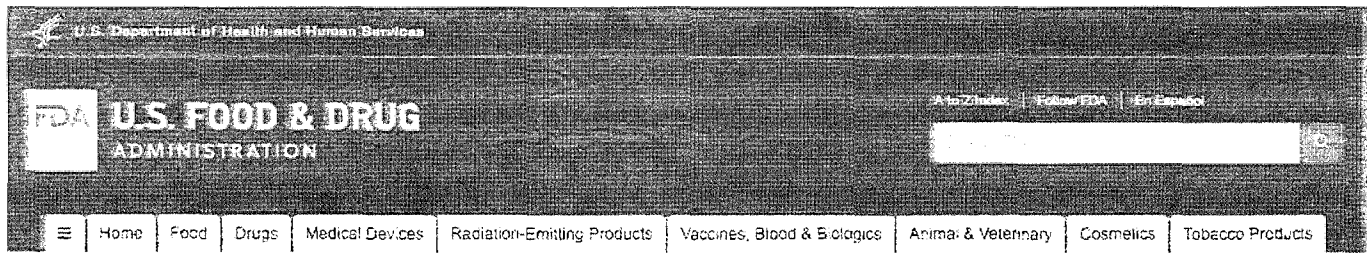
cc: Micah Portney via FedEx  
Barry Cohen via FedEx

Attachments:

1. Metron Nutraceuticals, LLC FDA Inspection Classification
2. Manufacturer site [zeohealth.com](http://zeohealth.com) screenshot
3. Manufacturer site [zeohealth.com](http://zeohealth.com) screenshot
4. Distributor site [zeolite.com](http://zeolite.com) screenshot
5. FDA Letter to Micah Portney, November 1, 2004
6. FDA Warning Letter to ZEO Health Ltd., June 29, 2007
7. California Department of Justice, Office of Attorney General, Biennial Report Major Activities in 2015-2016
8. FTC Warning Letter to Barry Cohen, April 20, 2020
9. SGS Chemical Solutions Laboratories, Analytical Report, April 30, 2021
10. Distributor site [zeolite.com](http://zeolite.com) screenshot
11. Distributor site [zeolite.com](http://zeolite.com) screenshot
12. Distributor site [zeolite.com](http://zeolite.com) screenshot
13. Manufacturer site [zeohealth.com](http://zeohealth.com) screenshot
14. Manufacturer site [zeohealth.com](http://zeohealth.com) screenshot
15. ATSDR – CDC Public Health Statement – Aluminum (September 2008)



## Attachment - 1



Home Inspection Classification Search Home

## Results: Inspection Classification Database Search

Search Results: 2 records found. 1 page.

[Search Again](#) | [Modify Search](#) | [Export](#)

[More Information on Search Form Fields](#)

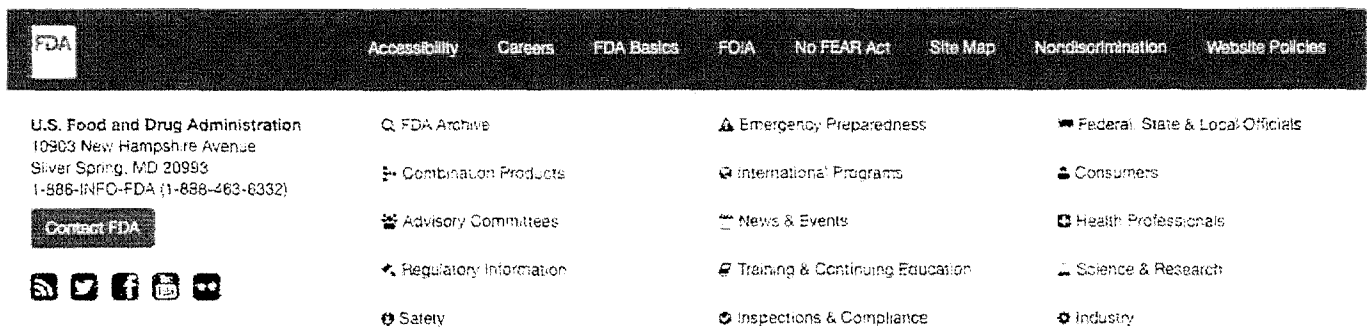
Number of Records Displayed: 2

Number of Records Found: 2



District	Firm Name	City	State	Zip Code	Country / Area	Inspection End Date	Center	Project Area	Classification
CIN	Metron Nutraceuticals, LLC	Cleveland	OH	44103	US	09/15/17	CFSAN	Food Composition, Standards, Labeling and Econ	NAI
CIN	Metron Nutraceuticals, LLC	Cleveland	OH	44103	US	09/15/17	CFSAN	Foodborne Biological Hazards	NAI

Note: If you need help accessing information in different file formats, see [Instructions for Downloading Viewers and Players](#).

Language Assistance Available: [Español](#) | [繁體中文](#) | [Tiếng Việt](#) | [한국어](#) | [Tagalog](#) | [Русский](#) | [العربية](#) | [Kreyòl Ayisyen](#) | [Français](#) | [Polski](#) | [Português](#) | [Italiano](#) | [Deutsch](#) | [日本語](#) | [فارسی](#) | [English](#)



## Attachment - 2

Zeolite powder with included measuring scoop

\$59.99

BUY MORE AND SAVE MORE!

- Buy 1 container \$59.99 each
- Buy 2 containers \$56.99 each
- Buy 3 containers \$53.99 each (+ FREE shipping)
- Buy 4+ containers \$50.99 each (+ FREE shipping)

Order Frequency

One-time \$59.99

Quantity

1

ADD TO CART

SKU: ZEOLITE-PURE

Add to wishlist

Share

Product

Product Reviews

## Zeolite powder with included measuring scoop

ZEOLITE PURE is the amazing all-natural mineral Zeolite that has been proven to absorb the toxins, free radicals, and heavy metals from your body, as well as boosting the immune system without side effects. This mineral will balance the body's pH. Foreign cells cannot grow in a balanced pH environment.

This mineral has been shown in independent studies to be effective in fighting certain types of health issues. This is the form of Zeolite proven effective in scientific studies.

For those not wanting to take capsules, ZEOLITE PURE is pure powdered Zeolite in an economical container.

## Features:

- The most economical Zeolite detox on the market.
- Approx 80 servings per container.
- Very finely micronized Zeolite



## Attachment - 3



## Excellence in Zeolite Supplementation for over 15 Years

### Welcome to ZEO Health Ltd.

The original manufacturer of Zeolite Health Supplements in the USA. Zeolite is a special, natural mineral, which has the unique ability to absorb and cleanse the body of harmful toxins and heavy metals. All of our Zeolite based supplements are made from the purest Zeolite possible, and work to balance pH levels and promote a healthy body.

### OUR PRODUCTS



☎ 888-578-7324 ✉ [support@zeolite.com](mailto:support@zeolite.com)

# Zeolite

Home » The History Of Zeolite.com » Products » Zeolite Pure » Zeolite Pure 100% Natural Micronized Zeolite Pure » Zeolite Pure 100% Natural Micronized Zeolite Pure



## Why The Best Heavy Metal Detox Product Is 100% Natural Micronized Zeolite Pure

by Barry Cohen | Sep 3, 2020 | Zeolite Detox | 0 comments

### Heavy Metal Contamination Begins Early In Life

Throughout our lives we have been and are still being bombarded with toxic heavy metals that are contaminating and accumulating in our bodies throughout our entire lives!

Babies are being contaminated with a mercury product disguised and called Thimerosal also called Thimerosal when they are shot full of vaccines! The extremely common (Measles, Mumps And Rubella) MMR Vaccine given to babies is loaded with Thimerosal and many people have no idea about the possible negative effects that these heavy metal exposures are having on babies and young children's physical and mental development.



#### Zeolite Pure®

*Zeolite Pure is the highest quality zeolite available. It is a natural mineral that is highly effective at absorbing and removing heavy metals, toxins, and free radicals from your body. It's safe for the immune system and has no negative side effects.*

**BUY NOW**

Attachment - 4



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration  
College Park, MD 20740

NOV - 1 2004

Mr. Micah S. Portney  
President  
ZEO Health Ltd.  
29 Sunset View Drive  
West Nyack, New York 10994

**Attachment - 5**

Dear Mr. Portney:

This is in response to your letter of October 4, 2004. Your letter responded to our September 29, 2004 concerning claims being made your product Esdifan™. These claims were the subject of a notification to FDA under 21 U.S.C. 343(r)(6) and 21 CFR 101.93.

In our September 29, 2004, we stated that the claims "Stops diarrhea," "Relieves diarrhea," and "Prevents diarrhea" suggested that the product is intended to treat, prevent, or mitigate a disease, namely diseases for which diarrhea is a characteristic sign or symptom, and that the product that was the subject of the claims, Esdifan™, appeared to be subject to regulation under the drug provisions of the Federal Food, Drug, and Cosmetic Act (the Act).

In your letter, you assert that diarrhea "is a symptom of another cause" such as "specific diseases, such as Irritable bowel Disease or Crohn's Disease, from bacterial or viral infection, or a symptom or side effect of taking a drug or antibiotic." For this reason, you ask FDA to reconsider the position set forth in our September 29, 2004 letter that diarrhea is a disease which subjects your product to regulation under the drug provisions of the Act and affirm to you that the diarrhea claims that were the subject of your notification are within the scope of claims that may be made in the labeling of dietary supplements pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Act).

We disagree with your assertion that diarrhea is not a disease as that term is defined in 21 CFR 101.93(g)(1). For purposes of 21 U.S.C. 343(r)(6), a "disease" is defined as "damage to an organ, part, structure, or system of the body such that it does not function properly (e.g. cardiovascular disease), or a state of health leading to such dysfunctioning (e.g., hypertension)." See 21 CFR 101.93(g)(1). The regulation also states that "FDA will find that a statement about a product claims to diagnose, mitigate, treat, cure, or prevent disease...if it meets one or more of the criteria listed below...." The regulation also states that FDA will consider the context in which the claim is made and that a claim may implicitly or explicitly be a disease claim. Among other criteria, a claim may be a disease claim if it is a claim that the product "has an effect on the characteristic signs or symptoms of a specific disease or class of diseases, using scientific or lay terminology" (21 CFR

975-6163

LET 791

Page 2 - Mr. Micah S. Portney

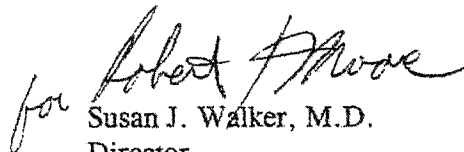
101.93(g)(2)(ii)) or “treats, prevents, or mitigates adverse events associated with a therapy for a disease, if the adverse event constitute diseases” (21 CFR 101.93(g)(2)(ix).

You state that diarrhea is a “symptom of another cause” which may be specific diseases such as Irritable Bowel Disease or Crohn’s Disease, infectious diseases, or a consequence of drug or antibiotic therapy. Diarrhea is unambiguously a consequence of damage to a system (the gastrointestinal system) such that it does not function properly, the dysfunction being evidence by the diarrhea<sup>1</sup>. That it is a characteristic sign or symptom of various diseases places it squarely within the scope of the definition of “disease” in 21 CFR 101.93(g). We continue to believe that the position set forth in our September 29, 2004 letter is correct and that claims that a product is intended for use to diagnose, mitigate, treat, cure, or prevent diarrhea cause the product to be subject to regulation as a drug.

You also state in your letter that an FDA employee verbally stated that claims about a product’s affect on diarrhea would be appropriate structure or function claims because diarrhea is a symptom and not a disease. We regret any confusion that may have been caused by the information you received concerning your proposed claims. However, it is important to recognize that whether a particular statement is or is not a disease claim depends on the context in which the statement is made. Statements about conditions, including symptoms, that may result from many causes, both disease and non-disease, may be able to be made in dietary supplement labeling under 21 U.S.C. 343(r)(6) if the claim makes clear that the product is only intended to affect the non-disease condition or symptom. In that your claim does not include such qualifying context, it remains a disease claim.

Please contact us if we may be of further assistance.

Sincerely yours,

  
for Susan J. Walker, M.D.

Director  
Division of Dietary Supplement Programs  
Office of Nutritional Products, Labeling  
and Dietary Supplements  
Center for Food Safety  
and Applied Nutrition

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<sup>1</sup>“An abnormally frequent discharge of semisolid or fluid fecal matter from the bowel”  
Stedman’s Medical Dictionary, 26<sup>th</sup> edition.

Page 3 - Mr. Micah S. Portney

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-310

FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of  
Enforcement, HFC-200

FDA, New York District Office, Office of Compliance, HFR-NE140





**ZEO Health Ltd.**

October 4, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, I-IFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5 100 Paint Branch Parkway  
College Park, MD 20740

OCT 18 2004

*Re: Label Claims/Disclaimers*

To Whom It May Concern:

This letter is in response to your letter, dated September 29, 2004, responding to our 30 day notification for labeling claims.

According to every medical dictionary, diarrhea is a symptom of another cause. The cause can be due to specific diseases, such as Irritable Bowel Disease or Crohn's Disease, from bacterial or viral infection, or a symptom or side effect of taking a drug or antibiotic.

We contacted your office and received a verbal response from Angela Pope on 4/21/2004 stating that your office, and that of the FDA, takes the position that diarrhea is a symptom and not a disease and therefore can be used in structure function claims. An associated legal firm also called Ms. Pope for confirmation on 4/22/2004, inquiring with the same question about the position the FDA takes on the definition of diarrhea for labeling, and received the same answer that diarrhea is a symptom of a disease and not a disease in and of itself.

29 Sunset View Drive  
West Nyack, New York 10994  
(845) 353-5185

89892



**ZEO Health Ltd.**

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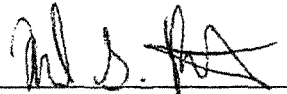
We have included in this letter, for your further consideration, a copy taken from the website of the FDA, clearly stating and listing diarrhea as *symptom* of other causes, and not a disease. We respectfully request that you reconsider your position as stated in the September 29, 2004 letter in light of this additional, supporting documentation. We are hopeful that the outcome of this reconsideration is consistent with the prior confirmations we were given.

OCT 18 2004

Thank you in advance for your continued cooperation. We are eager and willing to continue to comply with the guidelines as set by the FDA.

If you have any questions or need further information, please feel free to contact me.

ZEO Health, Ltd.

By: 

Name: Micah S. Portney

Title : President

29 Sunset View Drive  
West Nyack, New York 10994  
(845) 353-5185

**Attachment - 6**

## FDA Warning Letter to Zeo Health Ltd.

June 29, 2007



Department of Health and Human Services

Public Health Service  
Food and Drug Administration

Crofton Park, Maryland 20741

JUN 29, 2007

### WARNING LETTER CFSAN-OC-07-01

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

ZEO Health Ltd.  
29 Sunset View Drive  
West Nyack, New York 10994

Dear Sir or Madam:

This is to advise you that the Food and Drug Administration (FDA) has reviewed your web site at the internet address <http://www.zeohealth.com> and has determined that the products Esdifan, Destroxin, and Zeo are promoted for conditions that cause the products to be drugs under section 201(g)(1) of the Federal Food, Drug, and Cosmetic Act (the Act) (21 U.S.C. §321(g)(1)). The therapeutic claims on your web site establish that the products are drugs because they are intended for use in the cure, mitigation, treatment, or prevention of disease. The marketing of these products with these claims violates the Act.

Examples of some of the claims observed on your web site include:

#### **DESTROXIN**

"Destroxin - Cancer Prevention and Treatment"

"The scientific community has recently had very positive results on the effect of Zeolite on certain types of cancers. In tests on a variety of tumor types, the treatment with Zeolite led to improvement of overall health status, prolongation of life span, and a decrease in tumor size. Also, in local applications of Zeolite to skin cancer, it reduced tumor formation and growth."

"For prevention: As a nutritional supplement, take 2 capsules twice daily. As part of Cancer therapy: As a dietary supplement, take 6 capsules three times daily."

#### **ESDIFAN**

"Stops Diarrhea Fast and Naturally!"

"Esdifan is the most effective relief for diarrhea and bad stomach. Better than any drug on the market..."

"Irritable bowel, Crohns and others that suffer with chronic diarrhea rave about how well Esdifan really works!"



ZEO

"ZEO - The Hangover Preventive"

"When you drink alcohol, the body tries to break down the toxins.... These toxins are not fully broken down and cause damage to your organs. The side effects of this damage, we call a 'hangover' such as headache and nausea, as well as other ill effects that we can't see (liver damage). ZEO absorbs the toxins from the alcohol before they are processed into your organs."

The above claims about individual products are supplemented by claims on your homepage about your products in general and by metatags you use to bring consumers to your website. Examples of the metatags include "cancer prevention," "toxin removal," and "Natural supplements that... are proven to inhibit cancerous tumor growth, and will even prevent hangovers.... Effective diarrhea cure." Claims about disease prevention and treatment on your homepage include:

"We have products that remove toxins from your body, stop diarrhea... and even one that is proven to prevent hangovers if taken before drinking alcohol. The mineral used in our products has been shown in studies to be beneficial in treating cancer."

Your products are not generally recognized as safe and effective for the above referenced conditions and therefore, the products are also "new drugs" under section 201(p) of the Act [21 U.S.C. § 321 (p)]. New drugs may not be legally marketed in the U.S. without prior approval from FDA as described in section 505(a) of the Act [21 U.S.C. § 355(a)]. FDA approves a new drug on the basis of scientific data submitted by a drug sponsor to demonstrate that the drug is safe and effective.

In addition, we note that your website states the following: "This form of Zeolite is approved by the FDA as completely safe...." We have cited several examples in this letter to demonstrate that you are not in compliance with FDA requirements. Further, FDA has not reviewed the safety of Zeolite, nor its interactions with other substances. Therefore, the use of this statement to promote your products is false or misleading in that it implies FDA approval or sanction of your product and its purported uses. The false and misleading information misbrands your Zeolite products under section 403(a)(1) of the Act [21 U.S.C. § 343(a)(1)].

The above violations are not meant to be an all-inclusive list of deficiencies in your products and their labeling. It is your responsibility to ensure that products marketed by your firm comply with the Act and its implementing regulations.

The Act authorizes the seizure of illegal products and injunctions against manufacturers and distributors of those products. You should take prompt action to correct these deviations and prevent their future recurrence. Failure to do so may result in enforcement action without further notice.

Please notify this office, in writing, within fifteen (15) working days of the receipt of this letter, as to the specific steps you have taken to correct the violations noted above and to assure that similar violations do not occur. Include any documentation necessary to show that correction has been achieved. If corrective actions cannot be completed within fifteen working days, state the reason for the delay and the time within which the corrections will be completed.

Your response should be directed to Kristen L. Moe, Compliance Officer, Food and Drug Administration, Center for Food Safety and Applied Nutrition, Division of Enforcement (HFS-608), 5100 Paint Branch Parkway, College Park, Maryland 20740-3835.

Sincerely,

/S/

Joseph R. Baca  
Director  
Office of Compliance  
Center for Food Safety  
And Applied Nutrition

**Attachment - 7**

California Department of Justice  
Office of the Attorney General

Biennial Report  
Major Activities in 2015-2016



**Kamala D. Harris**  
**Attorney General**

*Pakootas v. Teck Cominco Metals, Ltd.* On behalf of the Department of Toxic Substances Control, the Attorney General's Office filed an amicus brief in the Ninth Circuit, addressing a critical legal question interpreting the federal "Superfund" law (CERCLA). The case presents the issue on whether ground deposition of hazardous substances released into the air and then deposited on the ground constitutes "an arrangement for disposal" for the purposes of requiring the responsible party to pay for the cost of cleanup under CERCLA. The court has taken the case under submission.

*Defense of Proposition 65 Chemical Listing Decisions.* Over the past several years, the chemical industry has aggressively challenged many of the chemicals identified as causing cancer or reproductive toxicity pursuant to Proposition 65 and listed by the Office of Environmental Health Hazard Assessment (OEHHA). Once a chemical is listed, businesses must provide warnings prior to exposing people to the chemical. The Attorney General's Office has successfully defended OEHHA decisions and obtained trial court rulings upholding the listings in three cases involving the reproductive toxicants bisphenol A (BPA) and atrazine, and the carcinogen, diisononyl phthalate (DINP).

*People v. Zeo Health, Ltd.* This case was filed against Zeo Health, Ltd., its affiliate Regal Supplements LLC, and owner, Micah Portney, for unfair business practices and false advertising, based on the sale of products intended for consumption that are adulterated with excessively high amounts of lead and arsenic and false claims that the products are safe and cure diseases including cancer and autism.

*People v. Mondelēz.* The Attorney General's Office, a group of district attorneys, and a non-profit private enforcer brought suit against Mondelēz International because its Nabisco Ginger Snap Cookies contained high levels of lead (110 to 160 parts per billion) and did not provide a consumer warning, in violation of Proposition 65. In March 2016, a settlement was reached requiring Mondelēz to pay a civil penalty of \$568,750, locate a cleaner source of molasses (which was causing the high lead levels), and implement measures to reduce the lead levels in the cookies to 30 parts per billion.

### **Indian and Gaming Law**

The Indian and Gaming Law Section provides legal representation and advice regarding Indian law and gambling to the following entities:

- Governor's Office
- DOJ's Bureau of Gambling Control
- California Gambling Control Commission
- California Horse Racing Board
- State Lottery Commission
- Other offices and state agencies

**Attachment - 8**



Richard A. Quaresima  
Acting Associate Director  
Division of Advertising Practices

United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

April 20, 2020

**WARNING LETTER**

*VIA EMAIL TO [info@zeolite.com](mailto:info@zeolite.com)*

Barry Cohen  
2574 SE Burton St.  
Port St. Lucie, FL 34952

Re: Unsubstantiated claims for Coronavirus treatment or prevention

To Mr. Cohen:

This is to advise you that FTC staff has reviewed your website at <https://zeolite.com> on April 13, 2020. We also reviewed your social media website at <https://www.facebook.com/removeheavymetals/>, where you direct consumers to your website <https://zeolite.com>, where they can purchase health products. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

An example of a Coronavirus treatment or prevention claim on your social media website at <https://www.facebook.com/removeheavymetals/> includes:

- "Now is absolutely the time to prepare yourself and your family to be and stay healthy for [sic] the extremely contagious COVID-19 Coronavirus by boosting your immune systems while protecting yourselves for [sic] the virus! Its [sic] a smart idea to start taking Zeolite AV while also stocking up on more so you have it when you need it! This is because Zeolite AV removes the built up toxic heavy metals from your body to allow your bodies [sic] immune system to quickly grow and gain strength while also having the unique ability of preventing the reproduction of virus cells by coating both the host cell and the virus-cell with natural humic acid to help prevent virus cells from reproducing to [] make you sick! Possibly very sick if you catch the dangerous and very cont[agious] COVID-19 Coronavirus!" [Facebook post dated March 21, 2020]

Mr. Barry Cohen

April 20, 2020

Page 2

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the product identified above. Thus, any coronavirus-related prevention or treatment claims regarding such product are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

You are also advised to review all other claims for your products and immediately cease making claims that are not supported by competent and reliable scientific evidence.

Within 48 hours, please send a message to Richard Cleland, Assistant Director via electronic mail at [rcleland@ftc.gov](mailto:rcleland@ftc.gov) describing the specific actions you have taken to address the FTC's concerns. If you have any questions regarding compliance with the FTC Act, please contact Richard Cleland at 202-326-3088.

Very truly yours,

RICHARD  
QUARESIMA

Digitally signed by RICHARD  
QUARESIMA  
Date: 2020.04.20 08:50:48 -04'00'

Richard A. Quaresima  
Acting Associate Director  
Division of Advertising Practices



CHEMICAL SOLUTIONS  
LABORATORIES, INC.

## Attachment - 9

### Analytical Report

April 30, 2021

Dr. Nikolaos Tsirikos-Karapanos  
Metron Nutraceuticals, LLC  
4600 Euclid Avenue  
Suite 401  
Cleveland, OH 44103

Page 1 of 3

WO Number:

W21D0271

Client: Metron Nutraceuticals  
Client #: M3876  
Sample Type: Powder  
Collector: Client

Customer PO:

Date Received:

4/9/2021

Date Completed:

04/29/2021

Discard Date:

05/13/2021

CSL#: 21D0700

Zeolite Pure - Lot#: 2010254 - Exp: 10/2025

Parameter	Result	PQL	Method	Date	Instrument	Analyst
Aluminum	26,200 ppm	10	USP <730>	04/16/21	9000-2	RBP
Antimony*	<150 ppm	150	USP <233>	04/15/21	350X	KMS
Arsenic*	6.0 ppm	1.9	USP <233>	04/15/21	350X	KMS
Barium*	390 ppm	180	USP <233>	04/15/21	350X	KMS
Cadmium*	<0.63 ppm	0.63	USP <233>	04/15/21	350X	KMS
Calcium*	7,800 ppm	90	USP <730>	04/14/21	350X	KMS
Chromium*	<1,400 ppm	1,400	USP <233>	04/15/21	350X	KMS
Cobalt*	<6.3 ppm	6.3	USP <233>	04/15/21	350X	KMS
Copper*	<380 ppm	380	USP <233>	04/15/21	350X	KMS
Gold	<25 ppm	25	USP <233>	04/14/21	9000-2	HG
Iridium	<13 ppm	13	USP <233>	04/14/21	9000-2	HG
Lead*	17 ppm	0.63	USP <233>	04/28/21	300D	KMS
Lithium*	<69 ppm	69	USP <233>	04/15/21	350X	KMS
Magnesium*	2,100 ppm	5.0	USP <730>	04/14/21	350X	KMS
Mercury	<3.8 ppm	3.8	USP <233>	04/14/21	9000-2	HG
Molybdenum*	<380 ppm	380	USP <233>	04/15/21	350X	KMS
Nickel*	<25 ppm	25	USP <233>	04/15/21	350X	KMS
Osmium	<13 ppm	13	USP <233>	04/13/21	300D	KMS
Palladium	<13 ppm	13	USP <233>	04/14/21	9000-2	HG
Platinum	<13 ppm	13	USP <233>	04/14/21	9000-2	HG
Potassium*	26,000 ppm	5.0	USP <730>	04/14/21	350X	KMS
Rhodium	<13 ppm	13	USP <233>	04/14/21	9000-2	HG
Ruthenium	<13 ppm	13	USP <233>	04/14/21	9000-2	HG
Selenium*	<19 ppm	19	USP <233>	04/15/21	350X	KMS
Silver	<19 ppm	19	USP <233>	04/14/21	9000-2	HG
Thallium*	<1.0 ppm	1.0	USP <233>	04/15/21	350X	KMS
Tin*	<750 ppm	750	USP <233>	04/15/21	350X	KMS
Titanium	460 ppm	1.0	USP <730>	04/15/21	9000-2	JTP
Vanadium*	<13 ppm	13	USP <233>	04/15/21	350X	KMS





CHEMICAL SOLUTIONS  
LABORATORIES, INC.

## Analytical Report

April 30, 2021

Dr. Nikolaos Tsirikos-Karapanos  
Metron Nutraceuticals, LLC  
4600 Euclid Avenue  
Suite 401  
Cleveland, OH 44103

Page 2 of 3

WO Number:

W21D0271

Client: Metron Nutraceuticals  
Client #: M3876  
Sample Type: Powder  
Collector: Client

Customer PO:

Date Received:

4/9/2021

Date Completed:

04/29/2021

Discard Date:

05/13/2021

CSL#: 21D0700

Parameter	Result	Serving Size	Unit Weight	Specification
Aluminum	26,200 ppm	1 g	NA	NA
Antimony	<150 ppm	1 g	NA	NA
Arsenic	6.0 ppm	1 g	NA	NA
Barium	390 ppm	1 g	NA	NA
Cadmium	<0.63 ppm	1 g	NA	NA
Calcium	7,800 ppm	1 g	NA	NA
Chromium	<1,400 ppm	1 g	NA	NA
Cobalt	<6.3 ppm	1 g	NA	NA
Copper	<380 ppm	1 g	NA	NA
Gold	<25 ppm	1 g	NA	NA
Iridium	<13 ppm	1 g	NA	NA
Lead	17 ppm	1 g	NA	NA
Lithium	<69 ppm	1 g	NA	NA
Magnesium	2,100 ppm	1 g	NA	NA
Mercury	<3.8 ppm	1 g	NA	NA
Molybdenum	<380 ppm	1 g	NA	NA
Nickel	<25 ppm	1 g	NA	NA
Osmium	<13 ppm	1 g	NA	NA
Palladium	<13 ppm	1 g	NA	NA
Platinum	<13 ppm	1 g	NA	NA
Potassium	26,000 ppm	1 g	NA	NA
Rhodium	<13 ppm	1 g	NA	NA
Ruthenium	<13 ppm	1 g	NA	NA
Selenium	<19 ppm	1 g	NA	NA
Silver	<19 ppm	1 g	NA	NA
Thallium	<1.0 ppm	1 g	NA	NA
Tin	<750 ppm	1 g	NA	NA
Titanium	460 ppm	1 g	NA	NA
Vanadium	<13 ppm	1 g	NA	NA



CHEMICAL SOLUTIONS  
LABORATORIES, INC.

## Analytical Report

April 30, 2021

Dr. Nikolaos Tsirikos-Karapanos  
Metron Nutraceuticals, LLC  
4600 Euclid Avenue  
Suite 401  
Cleveland, OH 44103

Page 3 of 3

WO Number:

W21D0271

Client: Metron Nutraceuticals  
Client #: M3876  
Sample Type: Powder  
Collector: Client

Customer PO:

Date Received: 4/9/2021

Date Completed: 04/29/2021

Discard Date: 05/13/2021

Reviewed and Approved,  
SGS Chemical Solutions Laboratories, Inc.

DocuSigned by:

*Devin Pulliam*

AF6434AEAFED43A  
Quality Assurance

### Notes:

CONFIDENTIAL REPORT. This report is confidential and is for the sole use of the addressee.

This report can only be reproduced in full.

The units for the PQL are the same as those shown for the result.



## Attachment - 10

1-888-578-7334 support@zeolite.com

**Zeolite**

Home | The History Of Zeolite.com | Freshness | Zeolite Benefits | Zeolite | Zeolite Pure | Zeolite | Zeolite | Zeolite

**Zeolite Pure****Zeolite Pure®**

Zeolite Pure is the highest quality microcrystalline zeolite. 100 percent pure clinoptilolite zeolite available for adsorbing and removing heavy metals including aluminum, and can also known as fluorapatite (from fluorine), mercury due to dental applications, other toxins and free radicals from your body while cleansing the immune system and balancing the pH in the body, without side effects!

Zeolite Pure is a natural mineral, not a synthetic.

FACT—Foreign cells that can cause disease do not survive or grow well in a body that has a pH-balanced environment.

This (current) patent form of clinoptilolite zeolite has shown in published studies to be the most effective form of zeolite in fighting various types of health issues.

All ingredients in Zeolite Pure listed by the FDA are naturally recognized as being safe.

Zeolite Pure concentrated powder is tasteless, non-toxic and easy to mix in water, juice or smoothies to consumers if desired. It can be added into the food that you eat. It's great mixed in a juice, pudding or applesauce for children!

Zeolite Pure is far less expensive to purchase and you're BEST VALUE because it does not have the expense of manufacturing it into capsules, multiple bottles and packaging. You get a lot more for your money!

**Detox Dosage:** Take one scoop of Zeolite Pure mixed in water or juice three times a day for 90 days (scoop included).

**Supplement**  
Serving size One (1) Scoop  
Servings per container 88

Amount Per Serving % Daily

Zeolite (a natural mineral) 5 grams \*

\*Daily value not established

**DISCLAIMER:** Zeolite HAS NOT been approved by the FDA as a treatment for cancer or any specific disease. The statements above have been submitted by the manufacturer, and are not intended to be a substitute for professional medical advice. A physician or health care provider should be consulted for any medical condition at your discretion.

**UPDATE:** The FDA has listed Zeolite as a dietary supplement, and has recognized it as safe.

Zeolite Zeolite  
Fast Shipping! Easy to Use!

☎ 888-578-7324 ✉ support@zeolite.com

**Zeolite**

**Attachment - 11**

**Zeolite Pure**



## **Zeolite Pure®**

Zeolite Pure is the highest quality micronized medical grade 100 percent pure clinoptilolite zeolite available for absorbing and removing heavy metals including aluminum, (mercury also known as Thimerosal from vaccines), mercury due to dental amalgams, other toxins and free radicals from your body while boosting the immune system and balancing the pH in the body without side effects!

FOR INFORMATION: Zeolite Pure is a natural mineral that has been used for thousands of years to purify water and air. It is a natural ion-exchange material that can remove heavy metals and other toxins from the body.

**FACT**—Foreign cells that can cause disease do not survive or grow well in a body that has a pH-balanced environment!

This (Our) purest form of clinoptilolite zeolite has shown in published studies to be the most effective form of zeolite in fighting certain types of health issues.

All ingredients in Zeolite Pure listed by the FDA are generally recognized as being safe.

Zeolite Pure micronized powder is tasteless; non gritty and easy to mix in water, juice or smoothies to consume or if desired it can be added into

the food that you eat. It's great mixed in gravy, pudding or applesauce for children!

Zeolite Pure is far less expensive to purchase and you're BEST VALUE because it does not have the expense of manufacturing it into capsules, multiple bottles and packaging. You get a lot more for your money!

**Detox Dosage:** Take one scoop of Zeolite Pure mixed in water or juice three times a day for 90 days (scoop included)

This equals 1 Jar of Zeolite Pure per month or 3 jars for the full (DISCOUNTED) 90-day detox with free expedited shipping

**Maintenance Dose** Take one scoop of Zeolite Pure once a day mixed in water or juice for continued benefits.

NOTE: Always drink plenty of extra water while doing this or any detox.

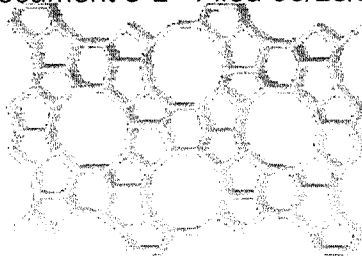
**\*The Proven Recommended Detox Protocol Is 3 Jars For Each Person**

**\$52.99**

**BUY NOW**

**SPECIAL SALE: Buy 3 Or More Jars ONLY \$50.99  
Each With Fast Free Shipping!**

**Zeolite has a honeycomb-like  
structure that traps Toxins**



# Supplement

Serving size One (1) Scoop

Servings per container 88

---

## Amount Per Serving % Daily

---

Zeolite (a natural mineral) 5 grams	*
-------------------------------------	---

---

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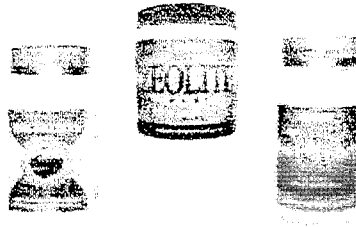
\*Daily value not established

**DISCLAIMER:** Zeolite HAS NOT been approved by the **FDA** as a treatment for cancer or any specific disease. In addition, none of the statements above have been evaluated by the FDA. All content presented on [www.zeolite.com](http://www.zeolite.com) has been compiled to provide information about Zeolite. Always consult a physician or board certified health practitioner before taking this product. Use at your own risk.

UPDATE: The FDA has listed Zeolite on the GRAS List (Generally  
Recognized As Safe.)

Order Zeolite

Fast Shipping - Easy to Order



Copyright Zeolite | Powered By Cat60 Designs

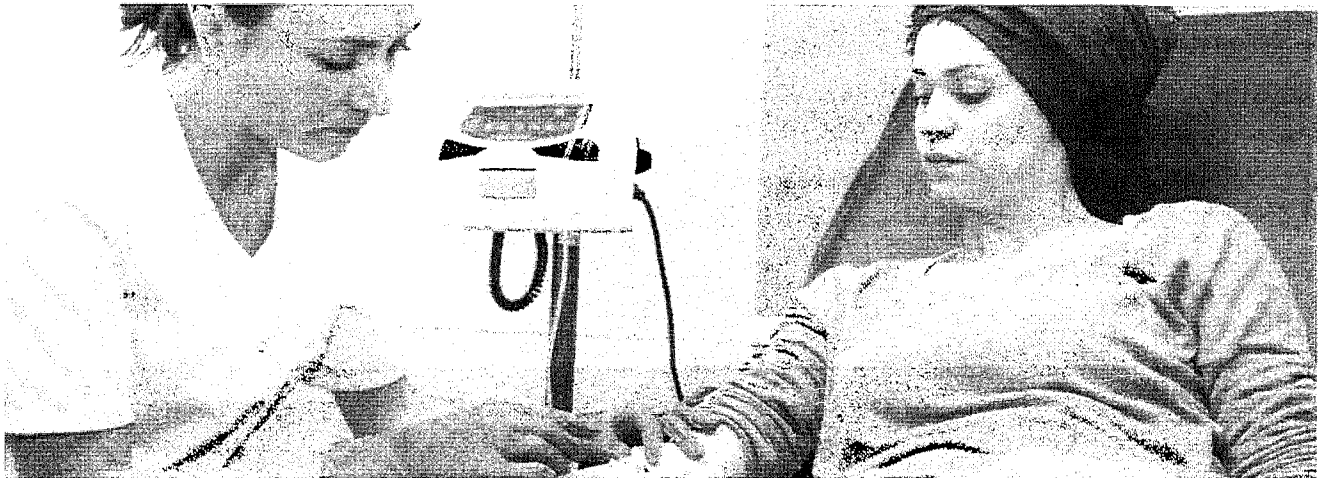
**Attachment - 12**

The Best Chemotherapy Detox That Restores The Immune System

☎ 888-578-7324 ✉ [support@zeolite.com](mailto:support@zeolite.com)

[Home](#) | [The History Of Zeolite.com](#) | [Products](#) | [Zeolite Reviews](#) | [Zeolite Benefits](#) | [Zeolite Blog](#) | [Contact Us](#)

The Best After Chemotherapy Detox That Also Strengthens The Immune System



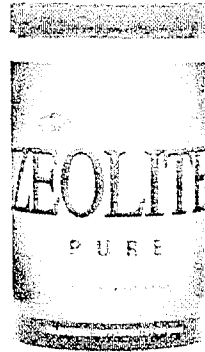
Detoxing the body after cancer chemotherapy, and in preparation for Stem Cell Transplants, Bone Marrow Transplants, and Organ Transplants a full body detox is





## Attachment - 13

Home / Products / Zeolite powder with included measuring scoop



Zeolite powder with included measuring scoop

\$59.99

(Unit price)

BUY MORE AND SAVE MORE!

- Buy 1 container \$59.99 each
- Buy 2 containers \$56.99 each
- Buy 3 containers \$53.99 each (+ FREE shipping)
- Buy 4+ containers \$50.99 each (+ FREE shipping)

Order Frequency

One-time \$59.99

Quantity

1

SKU: ZEOLITE-PURE

Add to wishlist

Share

Product Product Reviews

Zeolite powder with included measuring scoop - Reviews

WRITE A REVIEW

saved my girl

Packaging ★★★★★

Effectiveness ★★★★★

My girlfriend was diagnosed with HPV and the doctors thought it had turned into cancer with in a month of taking the zeolite she was good. No trace of cancer or HPV.

borderline promotions - Chicago, IL

Was this review helpful?



Feeling on top of my world

Packaging ★★★★★

Effectiveness ★★★★★

I have a Autoimmune disease in the pancreas, this is very rare; there are only 20 of us in New Zealand. I have been using Zeolite powder for five days now and already I feel like a new man. Hopefully my pancreas might now be able to grow back. my body just feels like it has more energy and a sense of well being. I have had this disease for two years and have spent alot of time in hospital and off work, I have lost 80% of the pancreas. I will keep you up to date on my progress. Thank you Zeohealth. Hori.

Hori - Tauranga, New Zealand



Home / About Us

## About Us

ZEO Health Ltd. is the original manufacturer of zeolite supplements in the United States. We currently ship our high quality zeolite products worldwide. We have been in business since 1999 and are one of the most experienced zeolite supplement manufacturers in the world. ZEO Health Ltd. uses the most effective form of zeolite available. Our products are specifically formulated using the highest quality zeolite, in order to deliver the most effective health benefits. It is very important to know that there are various types of zeolites, and many different quality levels of each. All our products are manufactured in a secure GMP (Good Manufacturing Practices) licensed pharmaceutical facility under strict quality control. Every capsule and bottle contents are checked, rechecked, and safety sealed prior to leaving our facility. We make the strongest effort to produce the purest, highest quality products, in which you can have confidence.

Since we first started, ZEO Health Ltd. has grown into a globally recognized brand. Retail chains, health practitioners, and online stores worldwide distribute ZEO Health Ltd. zeolite products. ZEO Health LTD. is much more than just another supplement manufacturer; we are the most knowledgeable zeolite company around. We are able to private label our zeolite products, formulate and manufacture other zeolite products based on the customers' requirements under their label, or even supply the raw material zeolite ingredient for other supplement manufacturing companies. If you are a company looking to build a new zeolite product line, please contact us to see how we can assist.

## Our President

In 1998, Micah Portney recognized an untapped natural resource for health benefits and began to research the science behind zeolite technology. By 1999 he had founded ZEO Health Ltd., the first zeolite supplementation manufacturer in the United States and second in the world (by 2 months). While pioneering zeolite supplementation, Mr. Portney spent a significant amount of time educating people about the benefits of zeolite supplements, many times going through painstaking lengths to explain zeolite to skeptics.

Mr. Portney has worked with world renowned scientists and geologists in his quest to thoroughly understand the science behind zeolite and its uses for health. Over 15 years of detailed understanding and knowledge about this unique mineral has made him one of the foremost experts on zeolite supplementation in the world.

Because of Mr. Portney's extensive background, experience, and knowledge in pioneering and formulation of zeolite supplementation, he is often asked to appear at speaking engagements. If you would like to inquire about having Mr. Portney speak at your event or help your company formulate a product, please send an email to [info@zeohealth.com](mailto:info@zeohealth.com).



**Attachment - 15****Division of Toxicology and Environmental Medicine****September 2008**

This Public Health Statement is the summary chapter from the Toxicological Profile for Aluminum. It is one in a series of Public Health Statements about hazardous substances and their health effects. A shorter version, the ToxFAQs™, is also available. This information is important because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, personal traits and habits, and whether other chemicals are present. For more information, call the ATSDR Information Center at 1-800-232-4636.

---

This public health statement tells you about aluminum and the effects of exposure to it.

The Environmental Protection Agency (EPA) identifies the most serious hazardous waste sites in the nation. These sites are then placed on the National Priorities List (NPL) and are targeted for long-term federal clean-up activities. Aluminum (in some form, e.g., in compounds with other elements such as oxygen, sulfur, or phosphorus) has been found at elevated levels in at least 596 of the 1,699 current or former NPL sites. Although the total number of NPL sites evaluated for this substance is not known, the possibility exists that the number of sites at which aluminum is found may increase in the future as more sites are evaluated. This information is important because these sites may be sources of exposure and exposure to this substance at high levels may be harmful.

When a substance is released either from a large area, such as an industrial plant, or from a container, such as a drum or bottle, it enters the environment. Such a release does not always lead to exposure. You can be exposed to a substance only when you come in contact with it. You may be exposed by breathing, eating, or drinking the substance, or by skin contact. However, it should be noted that aluminum is a very abundant and widely distributed element and will be found in most rocks, soils, waters, air, and foods. You will always have some exposure to low levels of aluminum from eating food, drinking water, and breathing air.

If you are exposed to aluminum, many factors will determine whether you will be harmed. These factors include the dose (how much), the duration (how long), and how you come in contact with it. You must

---

**DEPARTMENT of HEALTH AND HUMAN SERVICES, Public Health Service**  
**Agency for Toxic Substances and Disease Registry**

**[www.atsdr.cdc.gov/](http://www.atsdr.cdc.gov/) Telephone: 1-800-232-4636 Fax: 770-488-4178 E-Mail: [cdcinfo@cdc.gov](mailto:cdcinfo@cdc.gov)**



Division of Toxicology and Environmental Medicine

September 2008

### 1.9 WHAT RECOMMENDATIONS HAS THE FEDERAL GOVERNMENT MADE TO PROTECT HUMAN HEALTH?

The federal government develops regulations and recommendations to protect public health. Regulations *can* be enforced by law. The EPA, the Occupational Safety and Health Administration (OSHA), and the Food and Drug Administration (FDA) are some federal agencies that develop regulations for toxic substances. Recommendations provide valuable guidelines to protect public health, but *cannot* be enforced by law. The Agency for Toxic Substances and Disease Registry (ATSDR) and the National Institute for Occupational Safety and Health (NIOSH) are two federal organizations that develop recommendations for toxic substances.

Regulations and recommendations can be expressed as “not-to-exceed” levels, that is, levels of a toxic substance in air, water, soil, or food that do not exceed a critical value that is usually based on levels that affect animals; they are then adjusted to levels that will help protect humans. Sometimes these not-to-exceed levels differ among federal organizations because they used different exposure times (an 8-hour workday or a 24-hour day), different animal studies, or other factors.

Recommendations and regulations are also updated periodically as more information becomes available. For the most current information, check with the federal agency or organization that provides it. Some regulations and recommendations for aluminum include the following:

<b>Drinking water</b>	The EPA has recommended a Secondary Maximum Contaminant Level (SMCL) of 0.05–0.2 mg/L for aluminum in drinking water. The SMCL is not based on levels that will affect humans or animals. It is based on taste, smell, or color.
<b>Consumer products</b>	The FDA has determined that aluminum used as food additives and medicinals such as antacids are generally safe.  FDA set a limit for bottled water of 0.2 mg/L.
<b>Workplace air</b>	OSHA set a legal limit of 15 mg/m <sup>3</sup> (total dust) and 5 mg/m <sup>3</sup> (respirable fraction) aluminum in dusts averaged over an 8-hour work day.

DEPARTMENT of HEALTH AND HUMAN SERVICES, Public Health Service  
Agency for Toxic Substances and Disease Registry

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